

TSD File Inventory Index

Date: July 12, 2000

Initial: C.M. Gervasio

| | |
|--|--|
| Facility Name: <u>Durham - Boston Manufacturing Company (Plant - One Folcroft)</u> | |
| Facility Identification Number: <u>11D 062 406 038</u> | |
| A.1 General Correspondence | B.2 Permit Docket (B.1.2) |
| A.2 Part A / Interim Status | .1 Correspondence |
| .1 Correspondence | .2 All Other Permitting Documents (Not Part of the ARA) |
| .2 Notification and Acknowledgment | C.1 Compliance - (Inspection Reports) |
| .3 Part A Application and Amendments | C.2 Compliance/Enforcement |
| .4 Financial Insurance (Sudden, Non Sudden) | .1 Land Disposal Restriction Notifications |
| .5 Change Under Interim Status Requests | .2 Import/Export Notifications |
| .6 Annual and Biennial Reports | C.3 FOIA Exemptions - Non-Releasable Documents |
| A.3 Groundwater Monitoring | D.1 Corrective Action/Facility Assessment |
| .1 Correspondence | .1 RFA Correspondence |
| .2 Reports | .2 Background Reports, Supporting Docs and Studies |
| A.4 Closure/Post Closure | .3 State Prelim. Investigation Memos |
| .1 Correspondence | .4 RFA Reports |
| .2 Closure/Post Closure Plans, Certificates, etc | D. 2 Corrective Action/Facility Investigation |
| A.5 Ambient Air Monitoring | .1 RFI Correspondence |
| .1 Correspondence | .2 RFI Workplan |
| .2 Reports | .3 RFI Program Reports and Oversight |
| B.1 Administrative Record | .4 RFI Draft /Final Report |

Total - 1

| | | | |
|---|--|---|--|
| .5 RFI QAPP | | .6 CMI QAPP | |
| .6 RFI QAPP Correspondence | | .7 Lab Data, Soil-Sampling/Groundwater | |
| .7 Lab Data, Soil-Sampling/Groundwater | | .8 Progress Reports | |
| .8 RFI Progress Reports | | D.5 Corrective Action/Enforcement | |
| .9 Interim Measures Correspondence | | .1 Administrative Record 3008(h) Order | |
| .10 Interim Measures Workplan and Reports | | .2 Other Non-AR Documents | |
| D.3 Corrective Action/Remediation Study | | E. Boilers and Industrial Furnaces (BIF) | |
| .1 CMS Correspondence | | .1 Correspondence | |
| .2 Interim Measures | | .2 Reports | |
| .3 CMS Workplan | | F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.) | |
| .4 CMS Draft/Final Report | | G.1 Risk Assessment | |
| .5 Stabilization | | .1 Human/Ecological Assessment ... | |
| .6 CMS Progress Reports | | .2 Compliance and Enforcement ... | |
| .7 Lab Data, Soil-Sampling/Groundwater | | .3 Enforcement Confidential | |
| D.4 Corrective Action Remediation Implementation | | .4 Ecological - Administrative Record | |
| .1 CMI Correspondence | | .5 Permitting | |
| .2 CMI Workplan | | .6 Corrective Action/Remediation Study ... | |
| .3 CMI Program Reports and Oversight | | .7 Corrective Action Remediation Implementation ... | |
| .4 CMI Draft/Final Reports | | .8 Endangered Species Act | |
| .5 CMI QAPP | | .9 Environmental Justice | |

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual field per schedule.*



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD062406038 REACKNOWLEDGEMENT

BURGESS-NORTON MFG CO
737 PEYTON STREET
GENEVA

IL 60134

INSTALLATION ADDRESS

737 PEYTON STREET
GENEVA

IL 60134



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 12 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Charles Hokonson
Director
Burgess Norton MFG Co.
737 Peyton Street
Geneva, Illinois 60134

RE: Interim Status Acknowledgement USEPA ID No. ILD062406038
FACILITY NAME: Burgess-Norton MFG Co.

Dear Mr. Hokonson:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3005 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Amsted Industries Inc.

FACILITY NAME

BURGESS-NORTON MFG CO

EPA ID NUMBER

ILD062406038

FACILITY OPERATOR

AMSTED INDUSTRIES INCORPORATION

FACILITY OWNER

AMSTED INDUSTRIES INCORPORATION

FACILITY LOCATION

737 PEYTON STREET
GENEVA

IL 60134

PROCESS CODE

DESIGN CAPACITY

UNIT OF MEASURE

S01

22,500 ~~225000.00000~~

G

S02

1000.00000

G

*****KEY*****

| PROCESS | PRO- CESS CODE | APPROPRIATE UNITS OF MEASURE | * * UNIT OF * MEASURE | CODE |
|---------------------|----------------------|------------------------------------|-----------------------------|------|
| STORAGE: | | | * GALLONS | G |
| | | | * LITERS | L |
| CONTAINER | S01 | G OR L | * CUBIC YARDS | Y |
| TANK | S02 | G OR L | * CUBIC METERS | C |
| WASTE PILE | S03 | Y OR C | * GALLONS PER DAY | U |
| SURFACE IMPOUNDMENT | S04 | G OR L | * LITERS PER DAY | V |
| DISPOSAL: | | | * TONS PER HOUR | D |
| | | | * METRIC TONS\HOUR | W |
| INJECTION WELL | D79 | G,L,U, OR V | * GALLONS\HOUR | E |
| LANDFILL | D80 | A OR F | * LITERS\HOUR | H |
| LAND APPLICATION | D81 | B OR Q | * ACRE-FEET | A |
| OCEAN DISPOSAL | D82 | U OR V | * HECTARE-METER | F |
| SURFACE IMPOUNDMENT | D83 | G OR L | * ACRES | B |
| TREATMENT: | | | * HECTARES | Q |
| | | | * POUNDS\HOUR | J |
| TANK | T01 | U OR V | * KILOGRAMS\HOUR | R |
| SURFACE IMPOUNDMENT | T02 | U OR V | * TONS PER DAY | N |
| INCINERATOR | T03 | D,W,E, OR H | * METRIC TONS\DAY | S |
| OTHER | T04 | J,R,N,S,U,V | * | |

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

OFFICE OF THE
CHIEF PATENT ATTORNEY

April 25, 1982

RECEIVED

APR 29 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

EPA Region V
RCRA Activities
P. O. Box A3587
Chicago, Illinois 60690

RE: AMSTED Industries Incorporated
Burgess-Norton Mfg. Company division
Notification of Hazardous Waste Activity
737 Peyton Street
Geneva, Illinois 60134

ILD 062406038

g. PA

Dear Sirs:

Attached are amended pages 1-4 of Form 3 for the
Burgess-Norton Mfg. Co. Geneva plant, U.S. EPA ID No.
IL D06 2406 038.

The purpose of the amendment is twofold. Previously
listed waste stream #5 - EPA HW #D000 was so listed due
to a previous toxic classification of a zinc containing
waste stream. This is no longer so classified, so the
D000 item has been deleted from the amended list.
Secondly, the previously listed waste stream #3 - EPA
HW #F012 was incorrectly listed as it did not contain
cyanide-salt, but is now correctly listed as #D002, as
the stream does meet the corrosivity criteria.

Sincerely,



Edward J. Brosius
Patent Attorney

EJB:lk
Attachments

cc: F. Smith

RECEIVED
4/19/82

Amsted
INDUSTRIES

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

001341 AUG 20 80

ILD062406038

FOR OFFICIAL USE ONLY

COMMENTS

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------------|--|--|--|--|--|--|--|--|--|----------|--|--|--|--|--|--|--|--|--|---------------------------------|--|--|--|--|--|--|--|--|--|
| INSTALLATION'S EPA I.D. NUMBER | | | | | | | | | | APPROVED | | | | | | | | | | DATE RECEIVED (yr., mo., & day) | | | | | | | | | |
| F 1LD062406038 | | | | | | | | | | A | | | | | | | | | | 8/20/80 | | | | | | | | | |

I. NAME OF INSTALLATION

BURGESS-NORTON MFG. CO.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

737 PEYTON ST.

CITY OR TOWN

GENEVA

ST.

ZIP CODE

IL 60134

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

737 PEYTON ST.

CITY OR TOWN

GENEVA

ST.

ZIP CODE

IL 60134

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

HOKONSON CHARLES DIR. IND. REL. 312-232-4100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

AMSTED INDUSTRIES

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD062406038

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980

| I.D. - FOR OFFICIAL USE ONLY | | | | | | | | | |
|------------------------------|---|---|---|---|---|---|---|-----|---|
| S | W | 1 | 2 | 3 | 4 | 5 | 6 | 7/A | C |
| | | | | | | | | | |
| | | | | | | | | | |

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|----------------------|----------------------|----------------------|---------|---------|---------|
| 1 FOO1 23 - 26 | 2 FO10 23 - 26 | 3 FO12 23 - 26 | 4 | 5 | 6 |
| 7 | 8 | 9 | 10 | 11 | 12 |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

| | | | | | |
|---------|---------|---------|---------|---------|---------|
| 13 | 14 | 15 | 16 | 17 | 18 |
| 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

| | | | | | |
|---------|---------|---------|---------|---------|---------|
| 31 | 32 | 33 | 34 | 35 | 36 |
| 37 | 38 | 39 | 40 | 41 | 42 |
| 43 | 44 | 45 | 46 | 47 | 48 |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

| | | | | | |
|---------|---------|---------|---------|---------|---------|
| 49 | 50 | 51 | 52 | 53 | 54 |
| 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 | 23 - 26 |

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Stephen E. Kelm
EPA Form 8700-12 (6-80) REVERSE

STEPHEN E. KELM
ASSISTANT DIRECTOR INDUSTRIAL RELATIONS

8-4-80

AUG 18 1980

Please print or type with ELITE 1 (12 c.) s/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE
001541 AUG 20 80

ILD062406038

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER
F 1LD062406038
APPROVED
A
DATE RECEIVED
(yr., mo., & day)
8/20/80

I. NAME OF INSTALLATION

BURGESS-NORTON MFG. CO.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 737 PEYTON ST.

CITY OR TOWN

ST.

ZIP CODE

4 GENEVA

IL 60134

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 737 PEYTON ST.

CITY OR TOWN

ST.

ZIP CODE

6 GENEVA

IL 60134

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 JOHNSON CHARLES

DIR. IND. REL.

312 232 4100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 AMSTED INDUSTRIES

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD062406038

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

| I.D. - FOR OFFICIAL USE ONLY | | | | | | | | | |
|------------------------------|---|---|---|---|---|---|---|---|----|
| W | U | U | U | U | U | U | U | U | U |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

| 1 | 2 | 3 | 4 | 5 | 6 |
|------|------|------|----|----|----|
| FOO1 | FO10 | FO12 | | | |
| 7 | 6 | 9 | 10 | 11 | 12 |

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

| 13 | 14 | 15 | 16 | 17 | 18 |
|----|----|----|----|----|----|
| 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 |

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

| 31 | 32 | 33 | 34 | 35 | 36 |
|----|----|----|----|----|----|
| 37 | 38 | 39 | 40 | 41 | 42 |
| 43 | 44 | 45 | 46 | 47 | 48 |

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

| 49 | 50 | 51 | 52 | 53 | 54 |
|----|----|----|----|----|----|
| | | | | | |

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Stephen E. Helm
El 8700-12 (6-80) REVERSE

STEPHEN E. HELM
ASSISTANT DIRECTOR INDUSTRIAL RELATIONS

8-4-80

AUG 18 1980



Illinois Environmental Protection Agency - 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 0890350008 -- Kane County
Geneva/Burgess-Norton Manufacturing Company
ILD062406038
Part A Log #A012
RCRA - Permit

June 3, 1988

Burgess-Norton Manufacturing Company
737 Peyton Street
Attention: Frank J. Smith
Geneva, Illinois 60134

RECEIVED

JUN 15 1988

U. S. EPA, REGION V
SWB - PMS

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
JUN 14 1988

Dear Mr. Smith:

This letter is in response to your letter to U.S. EPA, Region V, dated February 12, 1986, requesting the deletion of tank storage (S02) from your RCRA Part A application.

Since Burgess-Norton was in the process of closing its container storage areas, the Agency has withdrawn your Part A application in conjunction with its June 2, 1988 approval of Burgess-Norton's closure certification (IEPA Log #C-169-M-3). This action removes Burgess-Norton from regulation as a RCRA storage facility and makes the facility subject to only the RCRA generator requirements at 35 IAC, Subtitle G, Part 722.

If you have questions, please contact Bob Carson at 217/782-6762.

Very truly yours,

Lawrence W. Eastep

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RAC:jd/1643j/31

cc: Maywood Region
Division File - Closure
Andy Vollmer
USEPA Region V -- Mary Murphy
USEPA Region V -- Art Kawatachi
Compliance Section
Bob Carson

FEB 26 1986

CERTIFIED MAIL #P 557 098 029
RETURN RECEIPT REQUESTED

SHS-13

Mr. Lawrence Eastep, Manager
Permit Section, OLPC
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Forwarding Correspondence
ILO 062406038

Dear Mr. Eastep:

Attached is a request for a revision of Part A permit application
from Burgess-Horton Manufacturing Company, in Geneva, Illinois.
We are forwarding this material to your office for review.

Sincerely,

James H. Hayka, Chief
Illinois Unit, TPS

Attachment

Clerk 2/26/86

| | TYP. | AUTH. | IL CHIEF | IL CHIEF | IL CHIEF | MIN/WD CHIEF | SH. CHIEF | TPS CHIEF | WMB CHIEF | WMD DIR |
|---------------|------------|------------|-------------|-------------|-------------|-----------------|--------------|--------------|--------------|------------|
| INIT. DATE | FR 2/26/86 | AB 2-26-86 | 2/26-86 | | | | | | | |

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS P
 TONS T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS K
 METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| LINE NO. | A. EPA HAZARDOUS WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES | |
|----------|--|---------------------------------------|------------------------------------|-----------------------------|--|
| | | | | 1. PROCESS CODES (enter) | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
| X-1 | 054 | 900 | P | T 0 3 D 8 0 | |
| X-2 | D 0 0 2 | 400 | P | T 0 3 D 8 0 | |
| X-3 | D 0 0 1 | 100 | P | T 0 3 D 8 0 | |
| X-4 | D 0 0 2 | | | | included with above |

| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | FOR OFFICIAL USE | | | |
|---|---------------------------------------|----|----|---------------------------------------|--------|----|---------------------------------|--------------------------|----|----|----|---|-------------------|--|--|--|
| W I L D 0 6 2 4 0 6 0 3 8 1 | | | | | | | | | | | | | S W 1 2 DUP 2 DUP | | | |
| DESCRIPTION OF HAZARDOUS WASTES (continued) | | | | | | | | | | | | | D. PROCESSES | | | |
| WASTE NO. | A. EPA HAZARD. WASTE NO. (enter code) | | | B. ESTIMATED ANNUAL QUANTITY OF WASTE | | | C. UNIT OF MEASURE (enter code) | 1. PROCESS CODES (enter) | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | | | | |
| | 23 | 24 | 25 | 26 | 27 | 28 | | 29 | 30 | 31 | 32 | 33 | 34 | | | |
| 1 | F | 0 | 0 | 1 | 20,000 | | P | S | 0 | 1 | | | | | | |
| 2 | D | 0 | 0 | 2 | 5,000 | | P | S | 0 | 2 | | | | | | |
| 3 | D | 0 | 0 | 2 | 50,000 | | P | S | 0 | 1 | | | | | | |
| 4 | | | | | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | | | | | |
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| 14 | | | | | | | | | | | | | | | | |
| 15 | | | | | | | | | | | | | | | | |
| 16 | | | | | | | | | | | | | | | | |
| 17 | | | | | | | | | | | | | | | | |
| 18 | | | | | | | | | | | | | | | | |
| 19 | | | | | | | | | | | | | | | | |
| 20 | | | | | | | | | | | | | | | | |
| 21 | | | | | | | | | | | | | | | | |
| 22 | | | | | | | | | | | | | | | | |
| 23 | | | | | | | | | | | | | | | | |
| 24 | | | | | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | | | | | |

CONTINUE ON REVERSE

Continued from the front.

DESCRIPTION OF HAZARDOUS WASTE (continued)
USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

I L D 0 6 2 4 0 6 0 3 8 6

FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

41 54 52

LONGITUDE (degrees, minutes, & seconds)

88 14 48

FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

W. W. Rasmussen
Vice President

B. SIGNATURE

W. W. Rasmussen

C. DATE SIGNED

JAN 25 1982

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

| | | |
|--|---|---|
| FORM 1 GENERAL | U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i> | I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F I L D 0 6 2 4 0 6 0 3 8 3 D </div> |
| II. FACILITY NAME III. FACILITY MAILING ADDRESS VI. FACILITY LOCATION | | GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p> |
| <div style="border: 1px solid black; padding: 10px;"> PLEASE PLACE LABEL IN THIS SPACE </div> | | |

| II. POLLUTANT CHARACTERISTICS | | | |
|--|----------|----|--|
| INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms. | | | |
| SPECIFIC QUESTIONS | MARK "X" | | SPECIFIC QUESTIONS |
| | YES | NO | |
| A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A) | | X | B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B) |
| C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C) | X | | D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D) |
| E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3) | X | | F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4) |
| G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) | | X | H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4) |
| I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) | | X | J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) |

| III. NAME OF FACILITY | |
|-----------------------|--------------------------------|
| 1 | SKIP BURGESS - NORTON MFG. CO. |

| IV. FACILITY CONTACT | |
|--|----------------------------|
| A. NAME & TITLE (last, first, & title) | B. PHONE (area code & no.) |
| 2 SMITH FRANK J. PLANT CHEMIST | 3 1 2 2 3 2 4 1 0 0 |

| V. FACILITY MAILING ADDRESS | |
|-----------------------------|-------------|
| A. STREET OR P.O. BOX | |
| 3 737 PEYTON STREET | |
| B. CITY OR TOWN | |
| 4 GENEVA | |
| C. STATE | D. ZIP CODE |
| IL | 6 0 1 3 4 |

| VI. FACILITY LOCATION | |
|---|-------------|
| A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER | |
| 5 737 PEYTON STREET | |
| B. COUNTY NAME | |
| KANE | |
| C. CITY OR TOWN | |
| 6 GENEVA | |
| D. STATE | E. ZIP CODE |
| IL | 6 0 1 3 4 |
| F. COUNTY CODE (if known) | |
| 689 | |

| FOR OFFICIAL USE ONLY | | | | | | | | | |
|-----------------------|--|-------------------|---|--|----|----------|--|--|--|
| APPLICATION | | DATE RECEIVED | | | | COMMENTS | | | |
| APPROVED | | (yr., mo., & day) | | | | | | | |
| | | | | | | | | | |
| 71 | | 24 | - | | 28 | | | | |

Place an "X" in the appropriate box in A or B below (*mark one box only*) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

| YR. | MO. | DAY |
|-----|-----|-----|
| 76 | 10 | 21 |

| YR. | MO. | DAY |
|-----|-----|-----|
| | | |

B. REVISED APPLICATION (place an "X" below and complete Item 1 above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

- B. PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.
1. **AMOUNT** – Enter the amount.
 2. **UNIT OF MEASURE** – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

| STORAGE AND DISPOSAL | | | TREATMENT | | |
|--------------------------------|----------------------|--|--|-------------------------|--|
| PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY | PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
| Storage: | | | Treatment: | | |
| CONTAINER (barrel, drum, etc.) | S01 | GALLONS OR LITERS | TANK | T01 | GALLONS PER DAY OR LITERS PER DAY |
| TANK | S02 | GALLONS OR LITERS | SURFACE IMPOUNDMENT | T02 | GALLONS PER DAY OR LITERS PER DAY |
| WASTE PILE | S03 | CUBIC YARDS OR CUBIC METERS | INCINERATOR | T03 | TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR |
| SURFACE IMPOUNDMENT | S04 | GALLONS OR LITERS | | | |
| Disposal: | | | OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) | | |
| INJECTION WELL | D79 | GALLONS OR LITERS | | T04 | GALLONS PER DAY OR LITERS PER DAY |
| LANDFILL | D80 | ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER | | | |
| LAND APPLICATION | D81 | ACRES OR HECTARES | | | |
| OCEAN DISPOSAL | D82 | GALLONS PER DAY OR LITERS PER DAY | | | |
| SURFACE IMPOUNDMENT | D83 | GALLONS OR LITERS | | | |
| UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE | UNIT OF MEASURE CODE |
| GALLONS | G | LITERS PER DAY | V | ACRE-FEET | A |
| LITERS | L | TONS PER HOUR | D | HECTARE-METER | F |
| CUBIC YARDS | Y | METRIC TONS PER HOUR | W | ACRES | B |
| CUBIC METERS | C | GALLONS PER HOUR | E | HECTARES | Q |
| GALLONS PER DAY | U | LITERS PER HOUR | H | | |

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

| S | T/A | C | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 |
|-------------|-----------------------------------|----------------------------|---------------------|---------------------------------|-----------------------|-------------|-----------------------------------|----------------------------|-----------|---------------------------------|-----------------------|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| C | DUP | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | 1. AMOUNT (specify) | 2. UNIT OF MEASURE (enter code) | FOR OFFICIAL USE ONLY | LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | 1. AMOUNT | 2. UNIT OF MEASURE (enter code) | FOR OFFICIAL USE ONLY | | | | | | | | | | | | | | | | | | | | | | | |
| X-1 | S 0 2 | 600 | G | | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| X-2 | T 0 3 | 20 | E | | 6 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | S 0 1 | 20,000 | G | | 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | S 0 1 | 2,500 | G | | 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | S 0 2 | 500 | G | | 9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | S 0 2 | 500 | G | | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04" FOR EACH PROCESS ENTERED HERE). INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS | P | KILOGRAMS | K |
| TONS | T | METRIC TONS | M |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

2. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | | | | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEA- SURE (enter code) | D. PROCESSES | | | | | | | | |
|-------------|--|---|---|---|--|---|-----------------------------|---|---|---|--|---|--|--|---------------------|
| | | | | | | | 1. PROCESS CODES (enter) | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | | | | |
| 1-1 | K | 0 | 5 | 4 | 900 | P | T | 0 | 3 | D | 8 | 0 | | | |
| 1-2 | D | 0 | 0 | 2 | 400 | P | T | 0 | 3 | D | 8 | 0 | | | |
| 1-3 | D | 0 | 0 | 1 | 100 | P | T | 0 | 3 | D | 8 | 0 | | | |
| 1-4 | D | 0 | 0 | 2 | | | | | | | | | | | included with above |

tinued from the front.

DESCRIPTION OF HAZARDOUS WASTES (continued)
USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

| | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|-----|----|
| I | L | D | 0 | 6 | 2 | 4 | 0 | 6 | 0 | 3 | 8 | 6 |
| | | | | | | | | | | | T/A | C |
| | | | | | | | | | | | 12 | 13 |

FACILITY DRAWING

Existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

Existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

I. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

| | | | | | |
|----|----|----|----|----|----|
| 4 | 1 | 5 | 4 | 5 | 2 |
| 65 | 66 | 67 | 68 | 69 | 71 |

LONGITUDE (degrees, minutes, & seconds)

| | | | | | |
|----|----|----|----|----|----|
| 8 | 8 | 1 | 4 | 4 | 8 |
| 72 | 74 | 75 | 76 | 77 | 79 |

III. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

W. W. Rasmussen
Vice President

W. W. Rasmussen

JAN 25 1982

C. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

| | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | | | FOR OFFICIAL USE ONLY | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 </div> | | | | | | | | | | | | | | | <div style="display: flex; justify-content: space-between;"> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 </div> | | | | | | | | | |
| <div style="display: flex; justify-content: space-between;"> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 </div> | | | | | | | | | | | | | | | <div style="display: flex; justify-content: space-between;"> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 </div> | | | | | | | | | |

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

D. PROCESSES

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | | | | B. ESTIMATED ANNUAL QUANTITY OF WASTE | | | | C. UNIT OF MEASURE (enter code) | 1. PROCESS CODES (enter) | | | | | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | | | |
|----------|---------------------------------------|----|----|----|---------------------------------------|----|----|----|---------------------------------|--------------------------|----|----|----|----|----|----|----|---|--|--|--|
| | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | | | | |
| 1 | F | 0 | 0 | 1 | 20,000 | | | | P | S | 0 | 1 | | | | | | | | | |
| 2 | D | 0 | 0 | 2 | 5,000 | | | | P | S | 0 | 2 | | | | | | | | | |
| 3 | D | 0 | 0 | 2 | 50,000 | | | | P | S | 0 | 1 | | | | | | | | | |
| 4 | | | | | | | | | | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | | | | | | | | | | |
| 6 | | | | | | | | | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | | | | | | | | |
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| 10 | | | | | | | | | | | | | | | | | | | | | |
| 11 | | | | | | | | | | | | | | | | | | | | | |
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| 24 | | | | | | | | | | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | | | | | | | | | | |

EPA I.D. NO. (enter from page 1)

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|-------|
| L | D | 0 | 6 | 2 | 4 | 0 | 6 | 0 | 3 | 8 | T/A/C |
| | | | | | | | | | | | 16 |

FACILITY DRAWING

Existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

Existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

| | | | | | |
|----|----|----|----|----|----|
| 4 | 1 | 5 | 4 | 5 | 2 |
| 43 | 44 | 45 | 46 | 47 | 48 |

LONGITUDE (degrees, minutes, & seconds)

| | | | | | |
|----|----|----|----|----|----|
| 8 | 8 | 1 | 4 | 4 | 8 |
| 72 | 73 | 74 | 75 | 76 | 77 |

FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

G. R. LOHMAN
Vice President

B. SIGNATURE

C. DATE SIGNED

Nov 17, 1980

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

ID 062406038

W

DUP

2

DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

D. PROCESSES

| LINE NO. | A. EPA HAZARD. (STENO. nter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | 1. PROCESS CODES (enter) | | | | | | | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | |
|----------|-----------------------------------|---------------------------------------|---------------------------------|--------------------------|--------------|--------------|----|----|----|----|----|---|--|
| | | | | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | | |
| 1 | F 0 0 1 | 20,000 | P | S | 0 | 1 | | | | | | | |
| 2 | F 0 1 0 | 5,000 | P | S | 0 | 2 | | | | | | | |
| 3 | F 0 1 2 | 5,000 | P | S | 0 | 2 | | | | | | | |
| 4 | D 0 0 2 | 50,000 | P | S | 0 | 1 | | | | | | | |
| 5 | D 0 0 0 | 50,000 | P | S | 0 | 1 | | | | | | | |
| 6 | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | |
| 9 | | | | | | | | | | | | | |
| 10 | | | | | | | | | | | | | |
| 11 | | | | | | | | | | | | | |
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| 16 | | | | | | | | | | | | | |
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| 24 | | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | | |

(continued)

ADDITIONAL PROCESS CODES OR F
DESIGN CAPACITY.

DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS | P | KILOGRAMS | K |
| TONS | T | METRIC TONS | M |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| | | | | D. PROCESSES | | | |
|----------|--|---------------------------------------|------------------------------------|-----------------------------|-----------|--|--|
| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | 1. PROCESS CODES (enter) | | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) | |
| X-1 | K 0 5 4 | 900 | P | T | 0 3 D 8 0 | | |
| X-2 | D 0 0 2 | 400 | P | T | 0 3 D 8 0 | | |
| X-3 | D 0 0 1 | 100 | P | T | 0 3 D 8 0 | | |
| X-4 | D 0 0 2 | | | | | included with above | |

OFFICIAL USE ONLY

SECTION DATE RECEIVED
JVED (yr., mo., & day)

COMMENT

FIRST OR REVISED APPLICATION

Enter in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

| YR. | MO. | DAY |
|-----|-----|-----|
| 76 | 10 | 21 |

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

| YR. | MO. | DAY |
|-----|-----|-----|
| | | |

REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

I. PROCESSES — CODES AND DESIGN CAPACITIES

PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.

2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

| PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY | PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|--------------------------------|----------------------|--|---|-----------------|--|
| Storage: | | | Treatment: | | |
| CONTAINER (barrel, drum, etc.) | S01 | GALLONS OR LITERS | TANK | T01 | GALLONS PER DAY OR LITERS PER DAY |
| TANK | S02 | GALLONS OR LITERS | SURFACE IMPOUNDMENT | T02 | GALLONS PER DAY OR LITERS PER DAY |
| WASTE PILE | S03 | CUBIC YARDS OR CUBIC METERS | INCINERATOR | T03 | TONS PER HOUR OR METRIC TONS PER HOUR |
| SURFACE IMPOUNDMENT | S04 | GALLONS OR LITERS | | | GALLONS PER HOUR OR LITERS PER HOUR |
| Disposal: | | | OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) | T04 | GALLONS PER DAY OR LITERS PER DAY |
| INJECTION WELL | D79 | GALLONS OR LITERS | | | |
| LANDFILL | D80 | ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER | | | |
| LAND APPLICATION | D81 | ACRES OR HECTARES | | | |
| OCEAN DISPOSAL | D82 | GALLONS PER DAY OR LITERS PER DAY | | | |
| SURFACE IMPOUNDMENT | D83 | GALLONS OR LITERS | | | |
| UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE | UNIT OF MEASURE CODE |
| GALLONS | G | LITERS PER DAY | V | ACRE-FEET | A |
| LITERS | L | TONS PER HOUR | D | HECTARE-METER | F |
| CUBIC YARDS | Y | METRIC TONS PER HOUR | W | ACRES | B |
| CUBIC METERS | C | GALLONS PER HOUR | E | HECTARES | Q |
| GALLONS PER DAY | U | LITERS PER HOUR | H | | |

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

| LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | | FOR OFFICIAL USE ONLY | LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | | FOR OFFICIAL USE ONLY |
|-------------|-----------------------------------|----------------------------|---------------------------------|-----------------------|-------------|-----------------------------------|----------------------------|---------------------------------|-----------------------|
| | | 1. AMOUNT (specify) | 2. UNIT OF MEASURE (enter code) | | | | 1. AMOUNT | 2. UNIT OF MEASURE (enter code) | |
| 1 | S 0 2 | 600 | G | | 5 | | | | |
| 2 | T 0 3 | 20 | E | | 6 | | | | |
| 3 | S 0 1 | 20,000 | G | | 7 | | | | |
| 4 | S 0 1 | 2,500 | G | | 8 | | | | |
| 5 | S 0 2 | 500 | G | | 9 | | | | |
| 6 | S 0 2 | 500 | G | | 10 | | | | |

FORM
3
RCRA



HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
S
F I L D 0 6 2 4 0 6 0 3 8
T/A C
3 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED

DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)
C
YR. MO. DAY
8 7 6 1 0 2 1
15 73 74 75 76 77 78
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

☐ 2. NEW FACILITY (Complete item below.)
71
FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
YR. MO. DAY
73 74 75 76 77 78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS
72
☐ 2. FACILITY HAS A RCRA PERMIT
72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.
1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

| PROCESS | PRO- CESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY | PROCESS | PRO- CESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|--------------------------------|----------------------|--|---|----------------------|--|
| Storage: | | | Treatment: | | |
| CONTAINER (barrel, drum, etc.) | S01 | GALLONS OR LITERS | TANK | T01 | GALLONS PER DAY OR LITERS PER DAY |
| TANK | S02 | GALLONS OR LITERS | SURFACE IMPOUNDMENT | T02 | GALLONS PER DAY OR LITERS PER DAY |
| WASTE PILE | S03 | CUBIC YARDS OR CUBIC METERS | INCINERATOR | T03 | TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR |
| SURFACE IMPOUNDMENT | S04 | GALLONS OR LITERS | OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.) | T04 | GALLONS PER DAY OR LITERS PER DAY |
| Disposal: | | | | | |
| INJECTION WELL | D79 | GALLONS OR LITERS | | | |
| LANDFILL | D80 | ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER | | | |
| LAND APPLICATION | D81 | ACRES OR HECTARES | | | |
| OCEAN DISPOSAL | D82 | GALLONS PER DAY OR LITERS PER DAY | | | |
| SURFACE IMPOUNDMENT | D83 | GALLONS OR LITERS | | | |
| UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE | UNIT OF MEASURE | UNIT OF MEASURE CODE | UNIT OF MEASURE CODE |
| GALLONS | G | LITERS PER DAY | ACRE-FEET | A | |
| LITERS | L | TONS PER HOUR | HECTARE-METER | F | |
| CUBIC YARDS | Y | METRIC TONS PER HOUR | ACRES | B | |
| CUBIC METERS | C | GALLONS PER HOUR | HECTARES | Q | |
| GALLONS PER DAY | U | LITERS PER HOUR | | | |

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S
C

DUP

T/A C
3 1

| LINE NUMBER | A. PRO- CESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | FOR OFFICIAL USE ONLY | LINE NUMBER | A. PRO- CESS CODE (from list above) | B. PROCESS DESIGN CAPACITY | FOR OFFICIAL USE ONLY |
|-------------|--|---------------------------------|--------------------------------|-------------|--|---------------------------------|--------------------------------|
| | | 1. AMOUNT (specify) | | | | 1. AMOUNT | |
| | | 2. UNIT OF MEASURE (enter code) | | | | 2. UNIT OF MEASURE (enter code) | |
| X-1 | S 0 2 | 600 | G | 5 | | | |
| X-2 | T 0 3 | 20 | E | 6 | | | |
| 1 | S 0 1 | 20,000 | G | 7 | | | |
| | S 0 1 | 22,500 | G | 8 | | | |
| 3 | S 0 2 | 500 | G | 9 | | | |
| 4 | S 0 2 | 500 | G | 10 | | | |

VII. SIC CODES (4-digit, in order of priority)

| | | | | | | | | | | | | | | | | | | | |
|-----------|----|----|----|----|-------------------------------|-----------|--|--|--|-----------|---|---|-----------|--|----|----|----|----|----|
| A. FIRST | | | | | | | | | | B. SECOND | | | | | | | | | |
| C | 7 | 3 | 7 | 1 | 4 | (specify) | | | | | C | 7 | (specify) | | | | | | |
| 15 | 16 | 17 | 18 | 19 | MACHINERY-OTHER THAN ELECTRIC | | | | | | | | | | 15 | 16 | 17 | 18 | 19 |
| C. THIRD | | | | | | | | | | D. FOURTH | | | | | | | | | |
| (specify) | | | | | | | | | | (specify) | | | | | | | | | |
| C | 7 | | | | | | | | | C | 7 | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | | | | | | | | | | | 15 | 16 | 17 | 18 | 19 |

VIII. OPERATOR INFORMATION

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|--|----|----|----|----|----|----|----|----|----|-------------|----|----|----|----|----|----|----|----|----|----------------------------|----|----|----|----|----|----|----|----|----|----|--|--|--|--|--|--|--|--|--|--|--|--|--|--|----|----|-----|----|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|-----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|----|--|--|--|--|--|--|--|--|--|
| A. NAME | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | B. Is the name listed in Item VIII-A also the owner? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C | 8 | A | M | S | T | E | D | I | N | D | U | S | T | R | I | E | S | I | N | C | O | R | P | O | R | A | T | E | D | | | | | | | | | | | | | | | | | | | | | | | | | | 66 | XX | YES | NO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | D. PHONE (area code & no.) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| F = FEDERAL | | | | | | | | | | M = PUBLIC (other than federal or state) | | | | | | | | | | P = PRIVATE | | | | | | | | | | O = OTHER (specify) | | | | | | | | | | P | | | | | | | | | | (specify) | | | | | | | | | | C | | | | | | | | | | 3 | | | | | | | | | | 1 | | | | | | | | | | 2 | | | | | | | | | | 6 | | | | | | | | | | 4 | | | | | | | | | | 5 | | | | | | | | | | 1 | | | | | | | | | | 7 | | | | | | | | | | 0 | | | | | | | | | | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S = STATE | | | | | | | | | | M = PUBLIC (other than federal or state) | | | | | | | | | | P = PRIVATE | | | | | | | | | | O = OTHER (specify) | | | | | | | | | | P | | | | | | | | | | (specify) | | | | | | | | | | C | | | | | | | | | | 3 | | | | | | | | | | 1 | | | | | | | | | | 2 | | | | | | | | | | 6 | | | | | | | | | | 4 | | | | | | | | | | 5 | | | | | | | | | | 1 | | | | | | | | | | 7 | | | | | | | | | | 0 | | | | | | | | | | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| E. STREET OR P.O. BOX | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | | | | | | | | | | 7 | | | | | | | | | | 0 | | | | | | | | | | 0 | | | | | | | | | | P | | | | | | | | | | R | | | | | | | | | | U | | | | | | | | | | D | | | | | | | | | | E | | | | | | | | | | N | | | | | | | | | | T | | | | | | | | | | I | | | | | | | | | | A | | | | | | | | | | L | | | | | | | | | | P | | | | | | | | | | L | | | | | | | | | | A | | | | | | | | | | Z | | | | | | | | | | A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| F. CITY OR TOWN | | | | | | | | | | G. STATE | | | | | | | | | | H. ZIP CODE | | | | | | | | | | IX. INDIAN LAND | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| B | | | | | | | | | | C | | | | | | | | | | H | | | | | | | | | | I | | | | | | | | | | C | | | | | | | | | | H | | | | | | | | | | I | | | | | | | | | | C | | | | | | | | | | A | | | | | | | | | | G | | | | | | | | | | O | | | | | | | | | | I | | | | | | | | | | L | | | | | | | | | | 6 | | | | | | | | | | 0 | | | | | | | | | | 6 | | | | | | | | | | 0 | | | | | | | | | | 1 | | | | | | | | | | Is the facility located on Indian lands? | | | | | | | | | | YES | | | | | | | | | | NO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | | | | | | | | | | 16 | | | | | | | | | | 17 | | | | | | | | | | 18 | | | | | | | | | | 19 | | | | | | | | | | 20 | | | | | | | | | | 21 | | | | | | | | | | 22 | | | | | | | | | | 23 | | | | | | | | | | 24 | | | | | | | | | | 25 | | | | | | | | | | 26 | | | | | | | | | | 27 | | | | | | | | | | 28 | | | | | | | | | | 29 | | | | | | | | | | 30 | | | | | | | | | | 31 | | | | | | | | | | 32 | | | | | | | | | | 33 | | | | | | | | | | 34 | | | | | | | | | | 35 | | | | | | | | | | 36 | | | | | | | | | | 37 | | | | | | | | | | 38 | | | | | | | | | | 39 | | | | | | | | | | 40 | | | | | | | | | | 41 | | | | | | | | | | 42 | | | | | | | | | | 43 | | | | | | | | | | 44 | | | | | | | | | | 45 | | | | | | | | | | 46 | | | | | | | | | | 47 | | | | | | | | | | 48 | | | | | | | | | | 49 | | | | | | | | | | 50 | | | | | | | | | | 51 | | | | | | | | | | 52 | | | | | | | | | | 53 | | | | | | | | | | 54 | | | | | | | | | | 55 | | | | | | | | | |

X. EXISTING ENVIRONMENTAL PERMITS

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|----|----|----|----|----|----|----|----|----|----|----|----|----|----|--|----|----|----|-----------|----|-----------|----|----|----|----|--|--|--|--|--|
| A. NPDES (Discharges to Surface Water) | | | | | | | | | | | | | | | D. PSD (Air Emissions from Proposed Sources) | | | | | | | | | | | | | | | |
| C | 9 | N | I | L | 0 | 0 | 3 | 6 | 3 | 3 | 1 | | | | | C | 9 | P | N | A | | | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | | | | | |
| B. UIC (Underground Injection of Fluids) | | | | | | | | | | | | | | | E. OTHER (specify) | | | | | | | | | | | | | | | |
| C | 9 | U | N | A | | | | | | | | | | | C | 9 | N | A | (specify) | | | | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | | | | | |
| C. RCRA (Hazardous Wastes) | | | | | | | | | | | | | | | E. OTHER (specify) | | | | | | | | | | | | | | | |
| C | 9 | R | N | O | N | E | | | | | | | | | | | C | 9 | N | A | (specify) | | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | | | | | |

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of piston pins.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|----------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| A. NAME & OFFICIAL TITLE (type or print) | | | | | | | | | | | | | | | B. SIGNATURE | | | | | | | | | | | | | | | C. DATE SIGNED | | | | | | | | | | | | | | |
| G. R. LOHMAN Vice President | | | | | | | | | | | | | | |  | | | | | | | | | | | | | | | Nov 17, 1980 | | | | | | | | | | | | | | |

COMMENTS FOR OFFICIAL USE ONLY

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 |

- 595
1. 2
 2. Burgess-Norton Mfg. Co. - Plant#1 - #002
 3. Industrial
 4. Daily
 5. $41^{\circ} 54' 52''$ Lat., $88^{\circ} 14' 48''$ Long
 6. NE $\frac{1}{4}$ of Section 3, Township 39N R 8E of 3rd P.M
 7. Kane
 8. Fox River

Sampling station located on NW corner of intersection of Edison and Stevens St. Station is the Easternmost manhole of two located at the same coordinates.

DRAWING #1

AREA MAP

BURGESS NORTON PLANT 1

GENEVA

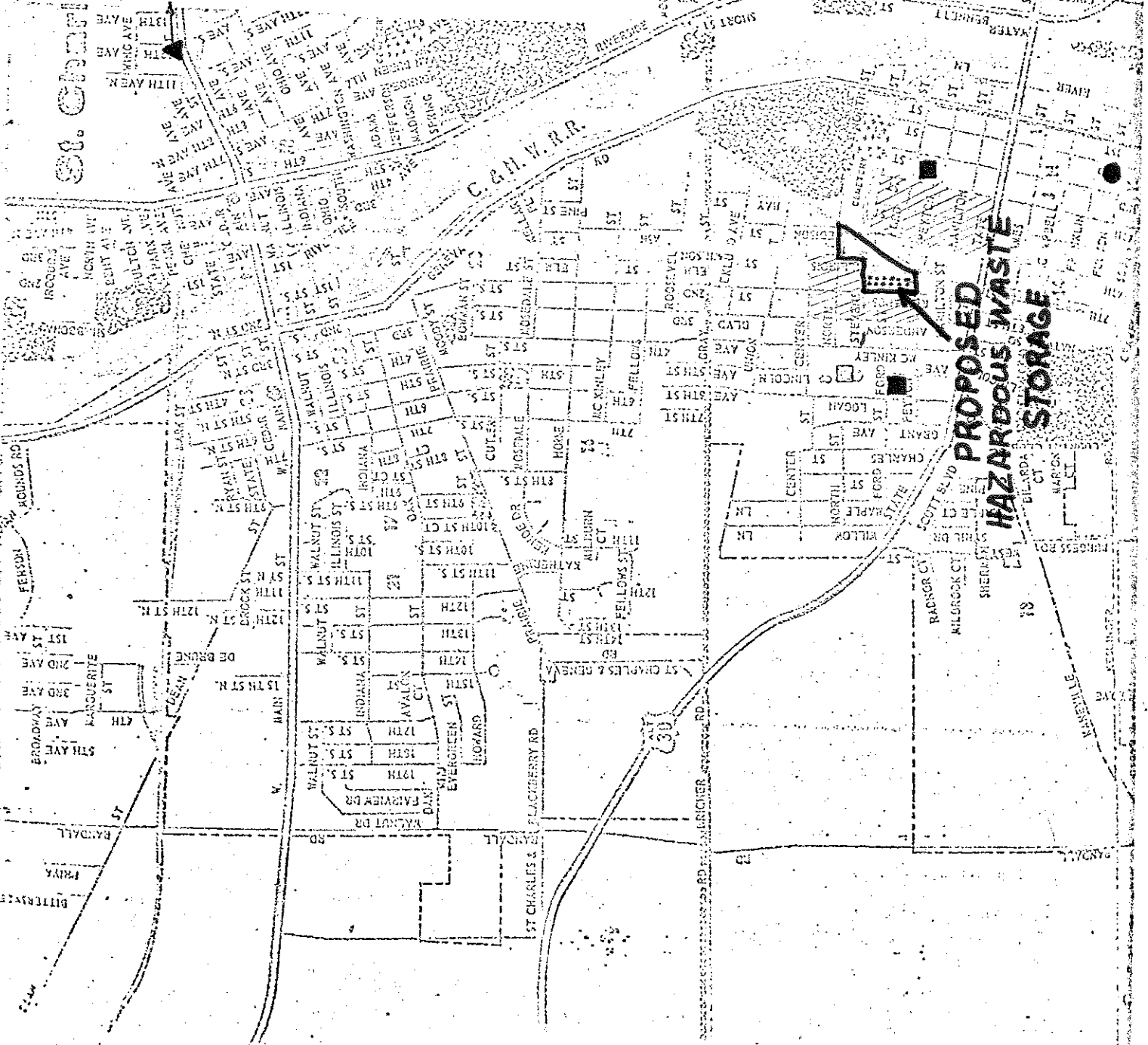
LOCATION OF PLANT

▲ NEAREST MOTEL

● NEAREST HOSPITAL

■ NEAREST SCHOOL

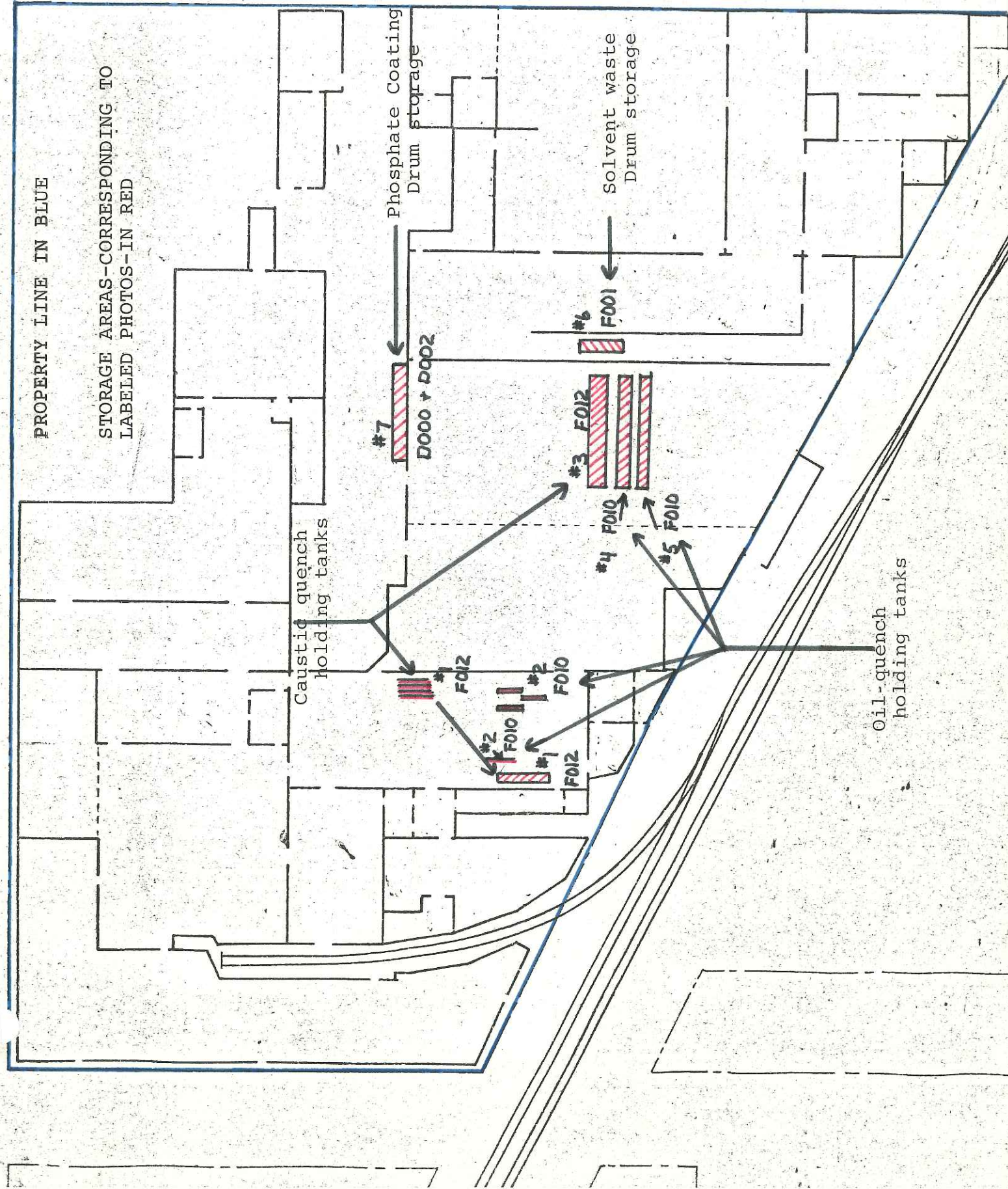
//// NEAREST RESIDENTIAL AREA



1 inch = 77 ft.

PROPERTY LINE IN BLUE

STORAGE AREAS-CORRESPONDING TO
LABELED PHOTOS-IN RED



IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

| | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|-----|----|
| S | F | I | L | D | 0 | 6 | 2 | 4 | 0 | 6 | 0 | 3 | 8 | T/A | C |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 |

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

| | | | | | |
|----|----|----|----|----|----|
| 4 | 1 | 5 | 4 | 5 | 2 |
| 65 | 66 | 67 | 68 | 69 | 71 |

| | | | | | |
|----|----|----|----|----|----|
| 8 | 8 | 1 | 4 | 4 | 8 |
| 72 | 74 | 75 | 76 | 77 | 79 |

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

| | | | | | |
|----|----|-----------------------|-----------------|--------|-------------|
| 15 | 16 | 3. STREET OR P.O. BOX | 4. CITY OR TOWN | 5. ST. | 6. ZIP CODE |
| C | F | C | G | | |
| 15 | 16 | 40 | 41 | 42 | 47 |

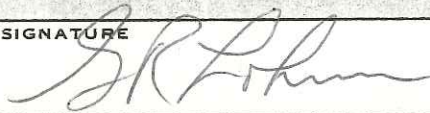
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

G. R. LOHMAN
Vice President

B. SIGNATURE



C. DATE SIGNED

Nov 17, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | FOR OFFICIAL USE ONLY | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---------------------------------------|----|----|----|---------------------------------------|----|----|----|---------------------------------|--------------------------|----|----|-----------------------|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| W I L D 0 6 2 4 0 6 0 3 8 3 1 | | | | | | | | | | | | | W DUP 3 2 DUP | | | | | | | | | | | | | | | | | | | | | | | | | |
| IV. DESCRIPTION OF HAZARDOUS WASTES (continued) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | | | | B. ESTIMATED ANNUAL QUANTITY OF WASTE | | | | C. UNIT OF MEASURE (enter code) | D. PROCESSES | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | 1. PROCESS CODES (enter) | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 |
| 1 | F | 0 | 0 | 1 | | | | | P | S | 0 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | F | 0 | 1 | 0 | | | | | P | S | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | F | 0 | 1 | 2 | | | | | P | S | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | D | 0 | 0 | 2 | | | | | P | S | 0 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | D | 0 | 0 | 0 | | | | | P | S | 0 | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | D | 0 | 0 | 2 | | | | | P | S | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code 4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS P
 TONS T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS K
 METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

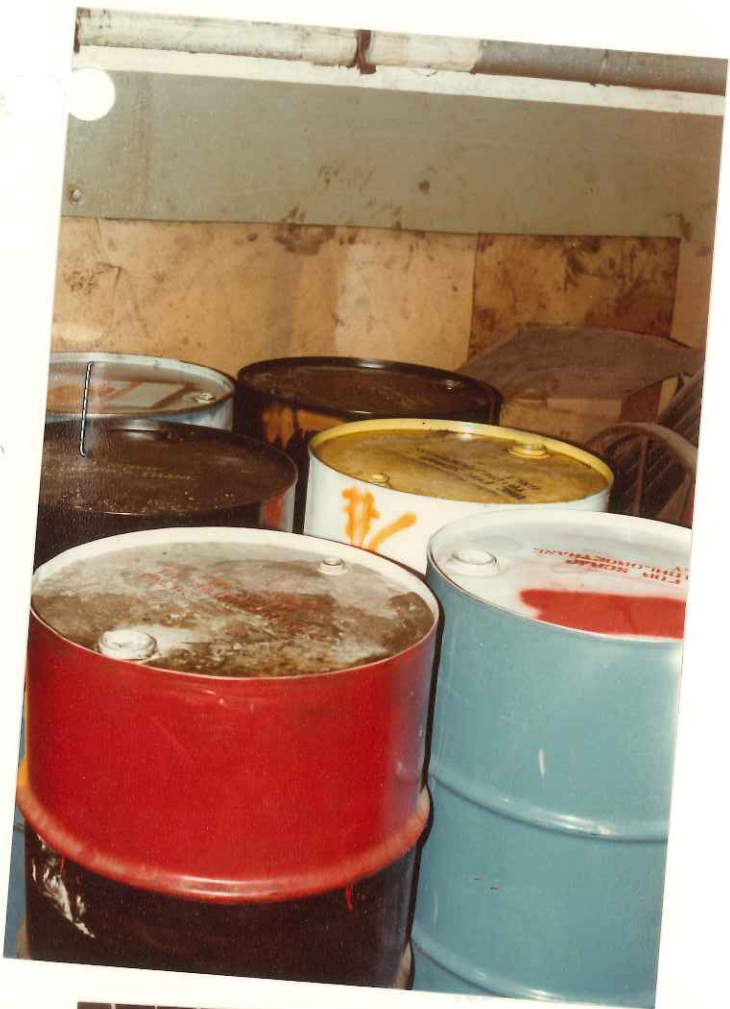
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

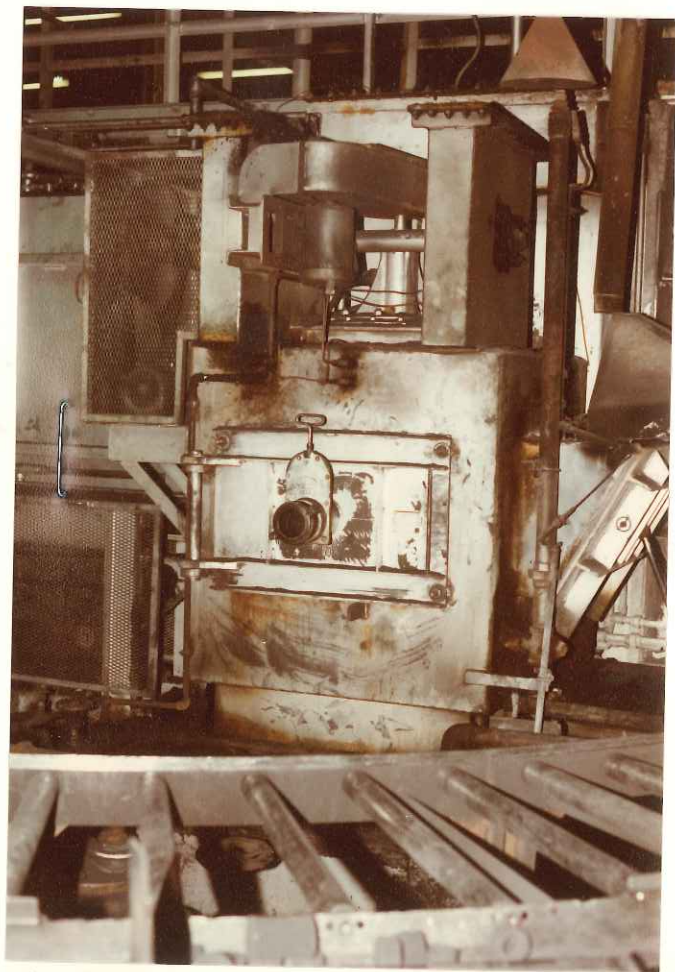
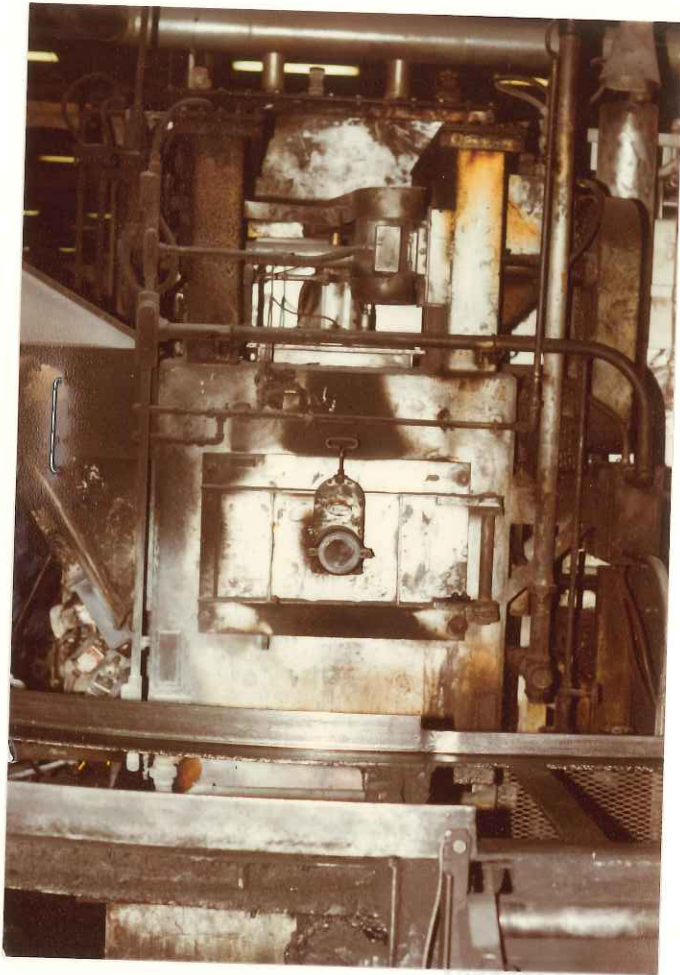
- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| LINE NO. X-1 X-2 X-3 X-4 | A. EPA HAZARDOUS WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES | |
|--------------------------------------|--|---------------------------------------|------------------------------------|-----------------------------|--|
| | | | | 1. PROCESS CODES (enter) | 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
| X-1 | K 0 5 4 | 900 | P | T 0 3 D 8 0 | |
| X-2 | D 0 0 2 | 400 | P | T 0 3 D 8 0 | |
| X-3 | D 0 0 1 | 100 | P | T 0 3 D 8 0 | |
| X-4 | D 0 0 2 | | | | included with above |









6217/782-6762

Refer to: 0890350008 -- Kane County
Geneva/Burgess-Norton Manufacturing Company
ILD062406038
Closure Plan Approved September 3, 1987 Log #A012
RCRA - Closure

June 2, 1988

Burgess-Norton Manufacturing Company
737 Peyton Street
Attention: Frank J. Smith
Geneva, Illinois 60134

Dear Mr. Smith:

The subject hazardous waste management facility was inspected by a representative of this Agency on February 18, 1988. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated September 3, 1987.

Certification that the container storage areas (S01) have been closed in accordance with the approved closure plan by the owner/operator, Burgess-Norton Mfg. Co, and an independent registered professional engineer, Gary F. Vajda, P.E., of Illinois was received at this Agency February 2, 1988.

1. The Agency has determined that the closure of the container storage areas (S01) have apparently met the requirements of interim status standards, 35 Ill. Adm. Code, Part 725.
2. The Agency hereby withdraws your Part A application to reflect the status change due to completed closure activities and to reflect the nonregulated status of the quench tanks which were included in the facility's original Part A application (IEPA Log #A012).
3. This facility must continue to meet the generator requirements of 35 Ill. Adm. Code, Subtitle G, Part 722. This facility is no longer subject to treatment, storage and disposal (TSD) requirements of 35 Ill. Adm. Code, Part 725.
4. In accordance with the requirements of 35 Ill. Adm. Code 725.243(h), further maintenance of RCRA financial assurance mechanisms is no longer needed.
5. In response to your inquiry of the status of IEPA or EPA action regarding Burgess-Norton's "Certification Regarding Potential Releases from Solid Waste Management Units", the following clarification is offered. The

RECEIVED

JUN 15 1988

U. S. EPA, REGION V
SWB - PMS

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
JUN 14 1988



Page 2

Agency includes a standard paragraph in all of its closure plan approval letters to acknowledge the receipt of the certification and to notify the owner/operator that the certification will be reviewed. This notification does not imply that enforcement action is being pursued by either the IEPA or EPA.

If you have questions, please contact Bob Carson at 217/782-6762.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence W. Eastep by CA".

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:RAC:bls/1613j,65,66

cc: Maywood Region
Division File - Closure
Andy Vollmer
Gary F. Vajda, P.E.
USEPA Region V -- Mary Murphy
USEPA Region V -- Art Kawatachi
Compliance Section
Bob Carson



BURGESS-NORTON MFG. CO.

737 PEYTON STREET • GENEVA, ILLINOIS 60134
(312) 232-4100 • TELEX 720-449

CERTIFIED MAIL -
RETURN RECEIPT
REQUESTED.

April 3, 1986

Lawrence W. Eastep, P.E., Manager
Permit Section
IEPA-DLPC
2200 Churchill Road
Springfield, IL 62706

CLOSURE PLAN REVIEW
BURGESS-NORTON MFG. CO., PLANT 1
U.S. EPA I.D. #062406038
IEPA I.D. #0890350008

ILD 062 406 036

Dear Mr. Eastep:

Upon review of the "Certification Regarding Potential Releases From Solid Waste Management Units" submitted to you 11/22/85, as well as the "Revised Closure Plan" submitted to Richard Carlson, Director IEPA 2/13/86, I have discovered an error in both. This error is on Page 2 of the Exhibits to the "Certification" and Page 2 of the "Revised Closure Plan."

The waste material generated from Burgess-Norton's Waste Pretreatment Plant is not, and should not, be classified as a hazardous waste. It should likewise not have an EPA HW# associated with it, and should not specifically have EPA HW#F006 - Wastewater Treatment Sludges From Electroplating Operations - Hazard Code T (cadmium, hexavalent chromium, nickel, cyanide 'complexed').

This waste stream has been analyzed by Chemical Waste Management (Attachment #1). This analysis indicates this waste stream to be non-hazardous according to RCRA and Illinois Administrative Code Title 35. IEPA has issued a Non-Hazardous Supplemental Permit #950170 for disposal of same (Attachment #2).

CLOSURE PLAN REVIEW
BURGESS-NORTON MFG. CO., PLANT 1
U.S. EPA I.D. #062406038
IEPA I.D. #0890350008 Continued ---

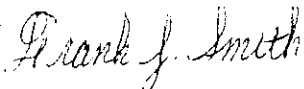
Burgess-Norton Mfg. Co. has no electroplating operations. It does have a zinc phosphate manufacturing process. Because of same, the process wastewater discharged from Burgess-Norton to the City of Geneva Sanitary Sewer System was covered by the "Electroplating" Federal Categorical Pretreatment Standards and is presently covered by the "Metalfinishing" Categorical Pretreatment Standards.

The use of the terms "Electroplating" in the Pretreatment Standards and the Hazardous Waste Regulations, but not interchangeably, led the writer to the aforementioned error in the "Certification" and "Revised Closure Plan." Pages 2 and 3 from the "Certification" demonstrate that the waste stream is not from treatment of electroplating wastewater. I have included them as Attachments #3 and #4 and have corrected the original error on Page 2.

Should you have any questions concerning this correspondence, do not hesitate to contact me.

Sincerely,

BURGESS-NORTON MFG. CO.



Frank J. Smith
Environmental Engineer

CC - B-N/SEKelm
File: Environmental Engineering - Plant 1
Facility Closure

AMSTED/EJBrosius

IEPA/Richard Carlsen, Director (Springfield)
Mark Haney (Springfield)

U.S. EPA
RCRA Activities
Region V
P.O.Box A3587
Chicago, IL 60690
Attn: ATKJG

SPECIAL WASTE ANALYSIS REPORT

LABORATORY: Chemical Waste Management

BURGESS-NORTON MFG CO
GENEVA, IL

SRCE: SAL SITE: CD2

SEWAGE TREATMENT SLUDGE

9269

PROFILE SHEET RECEIVED ON: 9/04/84 REPRESENTATIVE SAMPLE RECEIVED ON: 9/04/84

CERTIFICATE OF REP. SAMPLE RECEIVED: 9/04/84 SAMPLE TAKEN: 8/17/84

PROPOSED TREATMENT/DISPOSAL FACILITY: CID II

THE ANALYSES BELOW REPORTED WERE SELECTED BY ME, BASED UPON THE GENERATOR'S REPRESENTATIONS IN THE PROFILE SHEET AND ANY APPLICABLE WASTE ANALYSIS PLAN ESTABLISHED BY THE PROPOSED FACILITY FOR WASTE OF THIS TYPE. ANALYSES REQUIRED BY A WASTE ANALYSIS PLAN ARE INDICATED BY AN ASTERISK (*).

DATE OF ANALYSIS: 10-10-84 LAB MANAGER: John W. Kolonos

CWM #9269

| Test | As Received | EPT Leachate | Analyst Initials | Test | As Received | Leachate | Analyst Initials |
|--|-------------|--------------|------------------|---|-------------|----------|------------------|
| Specific Gravity | | | | | | | |
| pH 10% Solution | 7.7 | | | | | | |
| Acidity, % as | | | | Phenols, mg/l | <10 | | |
| Alkalinity, % as | | | | Cyanides, as CN, Total, mg/l | <10 | | |
| CO ₂ , mg/l | | | | Cyanides, as CN, Free, mg/l | | | |
| BOD ₅ , mg/l | | | | | | | |
| Total Solids @ 105°C | 27.25% | | | Nitrogen, Ammonia, as N, mg/l | | | |
| Total Dissolved Solids, mg/l | | | | Nitrogen, Organic, as N, mg/l | | | |
| Total Suspended Solids, mg/l | NA | | | Total Kjeldahl Nitrogen, as N, mg/l | | | |
| Residue on Evaporation @ 180°C | | | | | | | |
| Flash Point, F° | >212 | | | Total Alkalinity (P), as CaCO ₃ , mg/l | | | |
| Ash Content, on Ignition | 15.87% | | | Total Alkalinity (M), as CaCO ₃ , mg/l | | | |
| Heating Value, BTU/lb | | | | Total Hardness, as CaCO ₃ , mg/l | | | |
| "Acid Scrub," gNaOH/g | | | | Calcium Hardness, as CaCO ₃ , mg/l | | | |
| | | | | Magnesium Hardness, as CaCO ₃ , mg/l | | | |
| Arsenic, as AS, mg/l | 0.61 | | | | | | |
| Barium, as Ba, mg/l | 258 | 0.68 | | Oil and Grease, mg/l | | | |
| Boron, as B, mg/l | | | | | | | |
| Cadmium, as Cd, mg/l | 2.57 | 0.01 | | | | | |
| Chromium, Total as Cr, mg/l | 73.2 | 0.01 | | Aldrin, mg/l | | | |
| Hexavalent Chromium @ Cr, mg/l | | | | Chlordane, mg/l | | | |
| Copper, as Cu, mg/l | 81.8 | | | DDT's, mg/l | | | |
| Iron, Total as Fe, mg/l | | | | Dieldrin, mg/l | | | |
| Iron, dissolved, as Fe, mg/l | | | | Endrin, mg/l | | | |
| Lead, as Pb, mg/l | 299 | 0.14 | | Heptachlor, mg/l | | | |
| Manganese, as Mn, mg/l | | | | Lindane, mg/l | | | |
| Magnesium, as Mg, mg/l | | | | Methoxychlor, mg/l | | | |
| Mercury, as Hg, mg/l | 0.0151 | | | Toxaphene, mg/l | | | |
| Nickel, as Ni, mg/l | 180 | | | Parathion, mg/l | | | |
| Selenium, as Se, mg/l | <0.05 | | | 2, 4, D, mg/l | | | |
| Silver, as Ag, mg/l | 2.00 | | | 2, 4, 5, TP (Silvex), mg/l | | | |
| Zinc, as Zn, mg/l | 2960 | 0.28 | | PCB's, mg/l | <5.0 | | |
| | | | | | | | |
| Bicarbonates, as HCO ₃ , mg/l | | | | | | | |
| Carbonates, as CO ₃ , mg/l | | | | | | | |
| Chlorides, as Cl, mg/l | | | | | | | |
| Fluorides, as F, mg/l | | | | | | | |
| Nitrate, as NO ₃ , mg/l | | | | | | | |
| Nitrite, as NO ₂ , mg/l | | | | | | | |
| Phosphate, as P, mg/l | | | | | | | |
| Sulfate, as SO ₄ , mg/l | | | | | | | |
| Sulfides, as S, mg/l | DISSOLVED | <10 | | | | | |

Black moist solid, Sept 8

This report has been prepared for the exclusive use and benefit of Chemical Waste Management. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report.



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

MARCH 11, 1985
APPLICATION RECEIVED: 01/31/85
PERMIT NUMBER: 950170-0316000056
PERMIT ISSUED TO:

WASTE STREAM NUMBER: 950170
PERMIT EXPIRES: 03/05/90

CHEMICAL WASTE MANAGEMENT
P.O. BOX 129

CALUMET CITY, ILL.
60409

CHEMICAL WASTE MANAGEMENT
P.O. BOX 129

CALUMET CITY, ILL.
60409

WASTE NAME: SEWAGE TREATMENT SLUDGE
WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO EPC

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

DISPOSAL SITE: CID PROCESSING

IEPA SITE NO.: 0316000056

DISPOSITION OF WASTE:

WASTE TREATMENT

ATTENTION: FRANK SMITH

IEPA GENERATOR NO.:

WASTE GENERATOR: BURGESS-NORTON MFG CO-PLANT #1
737 PEYTON STREET
GENEVA, ILL.

60134

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS
ANY SPECIAL CONDITIONS LISTED BELOW.

LHE:KAS

CC: BURGESS-NORTON MFG CO-PLANT #1

REGION: N

W. EASTER, P.E.

MANAGER, PERMIT SECTION

DIVISION OF LAND POLLUTION CONTROL

3/14/85

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1984 | 1,995 | 12/04/84 |
| | 2,000 | 11/13/84 |
| | 2,000 | 11/09/84 |
| | 2,000 | 11/07/84 |
| | 2,000 | 10/29/84 |
| | 2,000 | 8/22/84 |
| | 2,000 | 7/25/84 |
| | 2,000 | 7/05/84 |
| 1983 | 2,000 | 10/28/83 |
| | 2,000 | 9/30/83 |
| | 2,000 | 6/28/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE NORTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #2 - FACILITY SITE PLAN - EXHIBIT #2)
 MAXIMUM STORAGE CAPACITY: 2,000 GALLONS
 DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 3) BULK STORAGE TANK #3 (ABOVE GROUND IN GRINDING ROOM BASEMENT)
 WASTES STORED: WASTE COOLANT & OIL FROM LAPPING (GRINDING) SYSTEM
 WASTE SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1985 | 2,000 | 2/09/85 |
| 1984 | 2,000 | 6/18/84 |
| 1983 | 2,000 | 6/27/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE SOUTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #3 - FACILITY SITE PLAN - EXHIBIT #2)
 MAXIMUM STORAGE CAPACITY: 2,000 GALLONS
 DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 4) WASTEWATER TREATMENT UNIT (ABOVE GROUND)
 WASTES STORED: WASTE OILS & PRECIPITATED SUSPENDED SOLIDS FROM THE PROCESS WASTEWATER DISCHARGES PRIOR TO WASTEWATER DISCHARGE TO CITY OF GENEVA MUNICIPAL SANITARY SEWER SYSTEM
 WASTE STREAM SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA & IEPA

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1985 | 3,500 | 10/18/85 |
| | 5,000 | 9/19/85 |
| | 5,000 | 8/19/85 |
| | 5,000 | 7/26/85 |
| | 5,000 | 7/01/85 |
| | 4,800 | 6/18/85 |
| | 4,000 | 5/30/85 |
| | 4,500 | 5/10/85 |
| | 4,500 | 4/17/85 |
| | 4,500 | 3/08/85 |
| | 2,500 | 1/24/85 |
| | | |

| <u>YEAR</u> | <u>VOLUME OF WASTE DEPOSITED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|--|---------------------------------|
| 1984 | 2,500 | 12/21/84 |
| | 2,650 | 11/29/84 |
| | 2,400 | 10/26/84 |
| | 2,500 | 9/27/84 |
| | 2,600 | 9/06/84 |
| | 2,650 | 8/15/84 |
| | 2,600 | 7/25/84 |
| | 2,500 | 6/28/84 |
| | 2,800 | 5/24/84 |
| | 2,100 | 4/19/84 |
| | 2,200 | 3/26/84 |
| | 2,500 | 3/06/84 |
| | 3,000 | 2/01/84 |
| | | |
| 1983 | 2,200 | 12/21/83 |
| | 2,500 | 11/22/83 |
| | 3,000 | 10/17/83 |
| | 2,300 | 9/14/83 |
| | 3,500 | 8/11/83 |
| | 3,500 | 7/06/83 |
| | 3,500 | 5/19/83 |
| | 3,500 | 4/20/83 |
| | 3,500 | 3/15/83 |
| | 3,500 | 2/16/83 |
| | 3,500 | 1/19/83 |

BULK SLUDGE HOLDING TANK COLLECTS WASTE OILS SKIMMED FROM PROCESS WASTEWATER DISCHARGED AS WELL AS PRECIPITATED SUSPENDED SOLIDS FROM PROCESS WASTEWATER DISCHARGES (REFERENCE #4 - FACILITY SITE PLAN - EXHIBIT #2)
 MAXIMUM STORAGE CAPACITY: 1,400 GALLONS, WITH 9" FREEBOARD
 DIMENSIONS: 6 FEET WIDE, 6 FEET LONG, 10.5 FEET DEEP

NOTE. . . SLUDGE IS OFTEN SLURRIED WITH WATER TO ALLOW PUMPING.
 THIS ACCOUNTS FOR THE VARIATION IN MAXIMUM STORAGE
 CAPACITY VERSUS ACTUAL VOLUME SHIPPED FOR DISPOSAL.

BURGESS-NORTON MFG. CO.

737 PEYTON STREET • GENEVA, ILLINOIS 60134

U.S. EPA
RCRA Activities
Region V
P.O. Box A3587
Chicago, IL 60690
Attn: ATKJG

RECEIVED

APR 04 1986

SWB - AID

U.S. EPA, REGION V



BURGESS-NORTON MFG. Co.

737 PEYTON STREET • GENEVA, ILLINOIS 60134
GENEVA (312) 232-4100 • CHICAGO (312) 378-4636 • TELEX 720-449

April 21, 1981

Mr. Karl J. Klepitsch, Chief
Waste Management Branch
United States Environmental Protection Agency
Region V
230 S. Dearborn St.
Chicago, IL 60604

Dear Mr. Klepitsch,

The hazardous waste permit application filed for interim status as a hazardous waste generator and storage facility for Burgess-Norton Mfg. Co. - Federal EPA I.D. #ILD062406038 needs to be amended.

Said amendment should reflect our request to de-list hazardous waste streams #F010 and #F012 from the hazardous waste storage permit application, form #3. It is the writer's understanding, according to Page 33131 of Volume 45 - #98 of the Federal Register, that these two waste streams are considered hazardous due to the level of cyanide, either as a salt or complexed.

Burgess-Norton does not use cyanide salts as a heat treating quench medium. The only quenching mediums in use are a straight quenching oil manufactured by Mobil Oil Corp. and 2-4% aqueous sodium hydroxide solution.

Sincerely yours,

Frank J. Smith
Plant Chemist

FJS:dm

P.S. Copy of Form 3 as amended is attached.

DATE: March 5, 1984

TO: Don Gimbel

FROM: Bill Seltzer *WS*

SUBJECT: Burgess-Norton Manufacturing Company
EPA File #7069-HAZ

I have referred the below-specified case to the USEPA and requested that a Compliance Order be issued for the facility's failure to comply with the financial assurance provisions of RCRA.

The referral has already been made. However, I would like you to carry this case along with your regular case load. Most likely, the only thing that will have to be done is that you will track the case's progress with the USEPA. The matter should be credited to you for the purposes of brochure referrals and should be carried on your bi-monthly status report.

The case is as follows:

Burgess-Norton Manufacturing Company
Geneva, Illinois
EPA File #7069-HAZ

WS:bkm



DATE: March 5, 1984

TO: File

FROM: Bill Seltzer *WS*

SUBJECT: Burgess-Norton Manufacturing Company
EPA File #7069-HAZ

USEPA provided IEPA with a list of facilities that were required to file financial assurance responsibility documents. Burgess-Norton Manufacturing Company is one of the facilities listed by USEPA.

Records of the IEPA reveal that financial assurance responsibility documentations have never been supplied to this Agency. Furthermore, records of the Illinois Secretary of State's Office (Corporation Division) reveal that the facility is not an Illinois corporation nor listed as a foreign corporation licensed to do business in Illinois.

According to the above, the caption now appearing in the draft Complaint which will be referred to USEPA is incorrect in that it specifies that Respondent is an Illinois corporation. The Complaint will have to be changed. However, USEPA is in possession of the information necessary to properly caption the Complaint. The only name given to IEPA by USEPA is a Mr. Frank J. Smith, who is specified as the "plant chemist."

WS:bkm

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

OFFICE OF THE
CHIEF PATENT ATTORNEY

August 1, 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Andrew Vollmer
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

RE: Hazardous Waste Facility
Liability Requirements

Dear Mr. Vollmer:

Enclosed is a financial responsibility letter for AMSTED's Burgess-Norton Mfg. Co. division facility in Geneva, Illinois. As a combined financial responsibility for closure costs and liability requirements is being provided, the wording of 40 CFR 264.151(g) was followed. The appropriate letter from our independent auditors and a copy of the annual report's financial statement are also enclosed.

Please advise the undersigned if any questions arise in this matter.

Sincerely,



Edward J. Brosius
Patent Attorney

EJB:lk
Enclosures

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

LESTER T. MOATE
EXECUTIVE VICE PRESIDENT
PHONE (312) 645-1622

August 1, 1983

Mr. Andrew Vollmer
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

RE: Hazardous Waste Facility
Liability Requirements

Dear Mr. Vollmer:

I am the chief financial officer of AMSTED Industries Incorporated, 3700 Prudential Plaza, Chicago, Illinois 60601. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Burgess-Norton Mfg. Co.
737 Peyton Street
Geneva, IL 60134
EPA I.D. No. ILD062406038

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:
None.

Amsted
INDUSTRIES

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

1. Burgess-Norton Mfg. Co.
737 Peyton Street
Geneva, IL 60134
EPA I.D. No. ILD062406038

Closure Cost Estimate: \$17200
2. Burgess-Norton Mfg. Co.
E. L. Anderson Boulevard
P. O. Box 188
Claremore, OK 74017
EPA I.D. No. OKD990750028

Closure Cost Estimate: \$3784
3. Diamond Chain Company
402 Kentucky Avenue
P. O. Box 7045
Indianapolis, IN 46207
EPA I.D. No. IND006067888

Closure Cost Estimate: \$661
4. Griffin Pipe Products Co.
2601 Ninth Avenue
P. O. Box 157
Council Bluffs, IA 51501
EPA I. D. No. IAD022079446

Closure plan being developed as treatment
and storage facility.
Estimated \$10,000 closure cost.

5. Griffin Pipe Products Co.
1100 W. Front Street
Florence, NJ 08518
EPA I. D. No. NJD003951985

Closure plan being developed with U. S.
EPA as treatment and storage facility.
Estimated \$10,000 closure cost.

6. Griffin Pipe Products Co.
Adams Street
P. O. Box 740
Lynchburg, VA 24505
EPA I.D. No. VAD000800532

Closure plan being developed as treatment
and storage facility.
Estimated \$10,000 closure cost.

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on September 30. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended September 30, 1982:

- | | |
|--|---------------------|
| 1. Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above) | \$ <u>51,645</u> |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ <u>8,000,000</u> |
| 3. Sum of lines 1 and 2 | \$ <u>8,051,645</u> |

| | |
|--|----------------------|
| *4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6) | <u>\$104,884,000</u> |
| *5. Tangible net worth | <u>\$359,749,000</u> |
| *6. Net worth | <u>\$371,349,000</u> |
| *7. Current assets | <u>\$207,206,000</u> |
| *8. Current liabilities | <u>\$ 80,107,000</u> |
| 9. Net working capital (line 7 minus line 8) | <u>\$127,099,000</u> |
| *10. The sum of net income plus depreciation, depletion and amortization | <u>\$ 41,207,000</u> |
| *11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.) | <u>\$ _____</u> |

| | YES | NO |
|---|---------------|---------------|
| 12. Is line 5 at least \$10 million? | <u>X</u> | <u> </u> |
| 13. Is line 5 at least 6 times line 3? | <u>X</u> | <u> </u> |
| 14. Is line 9 at least 6 times line 3? | <u>X</u> | <u> </u> |
| *15. Are at least 90% of assets located in the U.S.? If not, complete line 16 | <u>X</u> | <u> </u> |
| 16. Is line 11 at least 6 times line 3? | <u> </u> | <u> </u> |
| 17. Is line 4 divided by line 6 less than 2.0? | <u>X</u> | <u> </u> |
| 18. Is line 10 divided by line 4 greater than 0.1? | <u>X</u> | <u> </u> |
| 19. Is line 7 divided by line 8 greater than 1.5? | <u>X</u> | <u> </u> |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g), United States Environmental Protection Agency approved amendment, for the State of Illinois, as such regulations were constituted on the date shown immediately below.

A handwritten signature in cursive script, appearing to read "L. T. Moate", written over a horizontal line.

L. T. Moate
Executive Vice-President

AUGUST 1, 1983



200 EAST RANDOLPH DRIVE
CHICAGO, ILLINOIS 60601
312 565-1500

August 1, 1983

AMSTED Industries Incorporated
3700 Prudential Plaza
Chicago, Illinois 60601

We have examined the consolidated statement of financial position of AMSTED Industries Incorporated (the Company) and its subsidiary companies as of September 30, 1982 and the related consolidated statements of results of operations and of changes in financial position for the fiscal year then ended, and have issued our report thereon dated October 19, 1982, appearing on page 12 of the Company's 1982 Annual Report to Stockholders. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not examined any financial statements of the Company as of any date or for any period subsequent to September 30, 1982. Therefore, we are unable to and do not express any opinion on any financial statements as of any date or for any period subsequent to September 30, 1982.

As specified in Subpart H of 40 CFR Part 265, we have compared the tangible net worth (defined as total stockholders' equity less excess of cost of acquired assets over values assigned) and consolidated current assets and current liabilities as of September 30, 1982, which are disclosed in the August 1, 1983 letter from Mr. L. T. Moate, AMSTED's chief financial officer, to the Illinois Environmental Protection Agency, to the financial statements referred to above and found such amounts to be in agreement. In connection with our examination referred to in the preceding paragraph, we determined that total assets located in the United States exceeded 90% of total assets and agreed such information to the representations made in the letter referred to in the preceding sentence.

In connection with the procedures noted above, no matters came to our attention that caused us to believe that the specified information should be adjusted. It is understood that this report is solely for your information and is not to be referred to or distributed for any purpose other than distribution to the department listed in the preceding paragraph.

Yours very truly,

A handwritten signature in cursive script that reads "Price Waterhouse".

P05 7147566

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

| | | | |
|-----------------------------|---|--|--|
| SENT TO | | Illinois Environmental Protection Agency | |
| STREET AND NO. | | 2200 Churchill Road | |
| P.O., STATE AND ZIP CODE | | Springfield, IL 62706 | |
| POSTAGE | | \$ | |
| CONSULT POSTMASTER FOR FEES | CERTIFIED FEE | c | |
| | SPECIAL DELIVERY | c | |
| | RESTRICTED DELIVERY | c | |
| | OPTIONAL SERVICES | | |
| | RETURN RECEIPT SERVICE | | |
| | SHOW TO WHOM AND DATE DELIVERED | c | |
| | SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY | c | |
| | SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY | c | |
| | SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY | c | |
| TOTAL POSTAGE AND FEES | | \$ | |
| POSTMARK OR DATE | | | |

PS Form 3800, Apr. 1976

PS Form 3811, July 1982

| | |
|--|---|
| <p>• SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.</p> <p>(CONSULT POSTMASTER FOR FEES)</p> <p>1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery</p> <p>2. <input type="checkbox"/> RESTRICTED DELIVERY <small>(The restricted delivery fee is charged in addition to the return receipt fee.)</small></p> <p>TOTAL \$</p> | |
| <p>3. ARTICLE ADDRESSED TO: Illinois Environmental Protection Agency 2200 Churchill Road Springfield, IL 62706</p> | |
| <p>4. TYPE OF SERVICE: <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD <input type="checkbox"/> EXPRESS MAIL</p> | <p>ARTICLE NUMBER P057147566</p> |
| <p>(Always obtain signature of addressee or agent)</p> <p>I have received the article described above. <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706</p> | |
| <p>5. DATE OF DELIVERY, APR 9 1984</p> | <p>POSTMARK (may be on reverse side)</p> |
| <p>6. ADDRESSEE'S ADDRESS (Only if requested)</p> | |
| <p>7. UNABLE TO DELIVER BECAUSE:</p> | <p>7a. EMPLOYEE'S INITIALS</p> |

RETURN RECEIPT

★ GPO: 1982-379-583

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

OFFICE OF THE
CHIEF PATENT ATTORNEY

April 05, 1984

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

RE: Financial Responsibility Statement
Burgess-Norton Manufacturing Company
Geneva, Illinois
ILD062406038
Log No. FA080

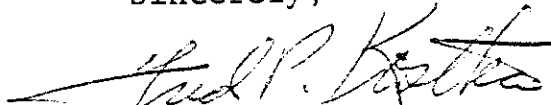
Dear Mr. Vollmer:

This is in reply to your letter of February 29, 1984 requesting an updated letter from the Chief Financial Officer on the appropriate State of Illinois form. Such form signed by Mr. L. T. Moate for AMSTED Industries Incorporated, of which Burgess-Norton Mfg. Co. is an unincorporated division, is attached.

Also enclosed are two copies of the closure plan and cost estimate per your request.

Please address any questions regarding this matter to the undersigned at the above address.

Sincerely,



Fred P. Kostka
Chief Patent Attorney

FPK:am

Amsted
Industries

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate
both liability coverage and assurance of closure
and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of AMSTED Industries Incorporated

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage ⁽¹⁾ and closure
and/or post closure care ⁽²⁾ as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois
Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the
financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois
Administrative Code Parts 724 and 725:

USEPA I.D. No. ILD062406038

Name Burgess-Norton Mfg. Co. ⁽³⁾

Address 737 Peyton Street, Geneva, IL 60134

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated
through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates
covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

| USEPA I.D. No. ⁽⁵⁾ | Closure Amount ⁽⁶⁾ | Post-Closure Amount ⁽⁷⁾ | Closure and Post-Closure Amounts ⁽⁸⁾ |
|-------------------------------------|----------------------------------|---------------------------------------|---|
| <u>ILD062406038</u> | | | |
| Name <u>Burgess-Norton Mfg. Co.</u> | | | |
| Address <u>737 Peyton Street</u> | <u>\$17,200</u> | <u>-</u> | <u>\$17,200</u> |
| City <u>Geneva, IL 60134</u> | | | |

USEPA I.D. No. _____

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

| USEPA I.D. No. <u>None</u> (5) | Closure Amount (6) | Post-Closure Amount (7) | Closure and Post-Closure Amounts (8) |
|-----------------------------------|--------------------------|-------------------------------|---|
| Name _____ | | | |
| Address _____ | | | |
| City _____ | | | |
| USEPA I.D. No. _____ | | | |
| Name _____ | | | |
| Address _____ | | | |
| City _____ | | | |

Please attach a separate page if more space is needed for all facilities.

3. For states other than Illinois this owner or operator or guarantor is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST ALL FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

| USEPA I.D. No. <u>OKD990750028</u> (5) | Closure Amount (6) | Post-Closure Amount (7) | Closure and Post-Closure Amounts (8) |
|--|--------------------------|-------------------------------|---|
| Name <u>Burgess-Norton Mfg. Co.</u> | | | |
| Address <u>E. L. Anderson Blvd. P.O. Box 188</u> | <u>\$7,962</u> | <u>-</u> | <u>\$7,962</u> |
| City <u>Claremore, OK 74017</u> | | | |
| USEPA I.D. No. <u>IND006067888</u> | | | |
| Name <u>Diamond Chain Company</u> | | | |
| Address <u>402 Kentucky Ave., P.O. Box 7045</u> | <u>\$15,047</u> | <u>-</u> | <u>\$15,047</u> |
| City <u>Indianapolis, IN 46207</u> | | | |

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is NOT demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

| USEPA I.D. No. <u>None</u> (5) | Closure Amount (6) | Post-Closure Amount (7) | Closure and Post-Closure Amounts (8) |
|-----------------------------------|--------------------------|-------------------------------|---|
| Name _____ | | | |
| Address _____ | | | |

3. USEPA I.D. NO. VAD000800532 and
VAD065417008

Name: Griffin Pipe Products Co.
Address: Adams Street, P.O. Box 740
State: Lynchburg, VA 24505

Closure
Amount

Post-
Closure
Amount

Closure and
Post-Closur
Amount

\$11,000

-

\$11,000

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative I

| | | |
|--|-----|-------------|
| Sum of current closure and post-closure cost estimates (total of all cost estimates listed above) | \$ | 51,209 |
| 2. Amount of annual aggregate liability coverage to be demonstrated | \$ | 2,000,000 |
| 3. Sum of lines 1 and 2 | \$ | 2,051,209 |
| *4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6) | \$ | 107,875,000 |
| *5. Tangible net worth | \$ | 346,334,000 |
| *6. Net worth | \$ | 357,189,000 |
| *7. Current assets | \$ | 212,423,000 |
| *8. Current liabilities | \$ | 66,942,000 |
| 9. Net working capital (line 7 minus line 8) | \$ | 145,481,000 |
| *10. The sum of net income plus depreciation, depletion, and amortization | \$ | 20,218,000 |
| *11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.) | \$ | |
| | Yes | No |
| 12. Is line 5 at least \$10 million? | X | / |
| 13. Is line 5 at least 6 times line 3? | X | / |
| 14. Is line 9 at least 6 times line 3? | X | / |
| *15. Are at least 90% of assets located in the U.S.? If not, complete line 16. | X | / |
| 16. Is line 11 at least 6 times line 3? | | / |
| 17. Is line 4 divided by line 6 less than 2.0? | X | / |
| 18. Is line 10 divided by line 4 greater than 0.1? | X | / |
| 19. Is line 7 divided by line 8 greater than 1.5? | X | / |

Signature

Lester T. Moate

Typed name

Lester T. Moate

Title

Executive Vice-President

Date

March 30, 1984

Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

- Sum or current closure and post-closure cost estimates (total of all cost estimates listed above) \$ _____
2. Amount of annual aggregate liability coverage to be demonstrated \$ _____
3. Sum of lines 1 and 2 \$ _____
4. Current bond rating of most recent issuance and name of rating service \$ _____
5. Date of issuance of bond _____
6. Date of maturity of bond _____
- *7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line) \$ _____
- *8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.) \$ _____
- | | Yes | No |
|--|-------|-------|
| 9. Is line 7 at least \$10 million? | _____ | _____ |
| 10. Is line 7 at least 6 times line 3? | _____ | _____ |
| *11. Are at least 90% of assets located in the U.S.? | _____ | _____ |
| If not, complete line 12. | _____ | _____ |
| 12. Is line 8 at least 6 times line 3? | _____ | _____ |

Signature

Typed name

Title

Date

USEPA I.D. No. _____

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest
(9) fiscal year.

The fiscal year of this owner or operator ends on September 30 *. The figures for the following items marked with an asterisk
(10) are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended
September 30, 1983.

(11)

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative I

Amount of annual aggregate liability coverage to be demonstrated \$ _____

*2. Current assets \$ _____

*3. Current liabilities \$ _____

4. Net working capital (line 2 minus line 3) \$ _____

*5. Tangible net worth \$ _____

*6. If less than 90% of assets are located in the U.S., give total U.S. assets \$ _____

| | Yes | No |
|--|-------|-------|
| 7. Is line 5 at least \$10 million? | _____ | _____ |
| 8. Is line 4 at least 6 times line 1? | _____ | _____ |
| 9. Is line 5 at least 6 times line 1? | _____ | _____ |
| *10. Are at least 90% of assets located in the U.S.? | _____ | _____ |
| If not, complete line 11. | | |
| 11. Is line 6 at least 6 times line 1? | _____ | _____ |

Signature _____

Typed name _____

Title _____

Date _____

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative II

1. Amount of annual aggregate liability coverage to be demonstrated \$ _____

2. Current bond rating of most recent issuance and name of rating service _____

3. Date of issuance of bond _____

4. Date of maturity of bond _____

*5. Tangible net worth \$ _____

*6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) \$ _____

| | Yes | No |
|---|-------|-------|
| 7. Is line 5 at least \$10 million? | _____ | _____ |
| 8. Is line 5 at least 6 times line 1? | _____ | _____ |
| *9. Are at least 90% of assets located in the U.S.? | _____ | _____ |
| If not, complete line 10. | | |
| 10. Is line 6 at least 6 times line 1? | _____ | _____ |

Signature _____

Typed name _____

Title _____

Date _____



200 EAST RANDOLPH DRIVE
CHICAGO, ILLINOIS 60601
312 565-1500

April 3, 1984

AMSTED Industries Incorporated
3700 Prudential Plaza
Chicago, Illinois 60601

We have examined the consolidated statement of financial position of AMSTED Industries Incorporated (the Company) and its subsidiary companies as of September 30, 1983 and the related consolidated statements of results of operations and of changes in financial position for the fiscal year then ended, and have issued our report thereon dated October 19, 1983, appearing on page 12 of the Company's 1983 Annual Report to Stockholders. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not examined any financial statements of the Company as of any date or for any period subsequent to September 30, 1983. Therefore, we are unable to and do not express any opinion on any financial statements as of any date or for any period subsequent to September 30, 1983.

As specified in Subpart H of 40 CFR (Code of Federal Regulations) Part 265, we have compared total liabilities, tangible net worth (defined as total stockholders' equity less excess of cost of acquired assets over values assigned), net worth (defined as total stockholders' equity) and current assets and current liabilities as of September 30, 1983, which are disclosed in the March 30, 1984 letter from Mr. L. T. Moate, AMSTED's chief financial officer, to the Illinois Environmental Protection Agency, to the financial statements referred to above and found such amounts to be in agreement. We have determined that the sum of net income plus depreciation, depletion and amortization included in the financial statements referred to above agrees to the amount disclosed in the letter referred to in the preceding sentence. We have also determined that total assets located in the United States exceeded 90% of total assets as of September 30, 1983 and agreed such information to the representations made in such letter.

In connection with the procedures noted above, no matters came to our attention that caused us to believe that the specified information should be adjusted. It is understood that this report is solely for your information and is not to be referred to or distributed for any purpose other than distribution to the agency listed in the preceding paragraph.

Yours very truly,

Price Waterhouse

BURGESS-NORTON MFG. CO.
DEPARTMENTAL CORRESPONDENCE

RECEIVED

JUL 28 1983

July 26, 1983

PATENT DEPT.

TO: Ed Brosius - Amsted Legal
FROM: Frank Smith
SUBJECT: Certified Letter from IEPA - Proof of Financial
Responsibility for Closure of B-N Plant #1

Attached is the original correspondence received by the writer
via certified mail, A.M., 7/26/83.

Per our phone conversation this A.M. I am referring said
correspondence to your office for review & ultimate disposition.

I have spoken to Andy Vollmer - IEPA and appraised him of same.

Please return a copy of "Proof of Financial Responsibility" to
the writer, following submission to IEPA.

Thank you.



Frank Smith

FJS/mr

CC: JEWilliams
DFHess
SEKelm
ASNyman

File: Ind. Relations: IEPA Waste Disposal Corr. Geneva - Plt.1
File: Chem.Lab.: IEPA Waste Disposal Corr. Geneva - Plt.1



217/782-5544

July 22, 1983

Certified Mail
Return Receipt Requested

Burgess-Norton Manufacturing Company
737 Payton Street
Geneva, Illinois 60134

Attn: Frank J. Smith, Plant Chemist
ILD062406038

Dear Mr. Smith:

Laws of both the Federal Government and the State of Illinois require an owner or operator of each hazardous waste management facility to provide assurance that funds will be available for properly closing, and in the case of a disposal facility, for maintaining and monitoring facilities after closure. Such financial responsibility assurances have been found necessary by the numerous instances of environmental damage resulting from the abandonment of facilities and other failure for closure and post-closure care in a timely manner.

Proof of financial responsibility as discussed above was to have been supplied to the Director of the Illinois Environmental Protection Agency. However, it appears that a hazardous waste management facility in your organization has failed to comport with the law by failing to submit the required financial assurances to the Illinois Environmental Protection Agency. The name of the facility in question is Burgess-Norton Manufacturing Company, located at 737 Payton Street, Geneva, Illinois 60134.

Failure to supply the required proof of financial responsibility is a violation of 35 Ill. Adm. Code Subpart H (see particularly Sections 725.243 and 725.245). Additionally, failure to submit proof of financial responsibility violates Sections 21(e), 21(f)(2), and 21(i) of the Illinois Environmental Protection Act (Ill. Rev. Stat., Ch. 111-1/2, pars. 1021(e), 1021(f)(2), and 1021(i)). Finally, failure to submit proof of financial responsibility is a violation of the Code of Federal Regulations. (See 40 CFR Subpart H).

Please take notice that a violation of the Illinois Environmental Protection Act or any regulations adopted thereunder may subject the violator to a civil penalty not to exceed \$10,000 for said violation and an additional penalty not to exceed \$1,000 for each day during which the violation continues. Furthermore, certain violations of the Illinois



Page 2

Environmental Protection Act, including Sections 21(f) and 21(i), may subject the violator to a civil penalty not to exceed \$25,000 per day, each day the violation continues (see Illinois Environmental Protection Act at Section 42 for potential civil penalties and Section 44 for potential criminal sanctions).

You are hereby advised that documentation demonstrating compliance with the applicable proof of financial responsibility must be submitted to the Illinois Environmental Protection Agency no later than ten (10) working days after receipt of this communication. The Director of this Agency has designated Mr. Andrew Vollmer as the Agency employee responsible for accepting and filing proof of financial responsibility. Therefore, your submissions should be made directly to Mr. Andrew Vollmer, Illinois Environmental Protection Agency, Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois 62706.

Please take notice that failure to supply the required proof of financial responsibility will cause this Agency to refer the matter to the Illinois Attorney General's Office for prosecution. Additionally, the Agency will formally refer the matter to the United States Environmental Protection Agency.

Failure to comply with the financial assurance requirements specified under the law is viewed by this Agency as an inexcusable and serious deviation from laws designed to protect our environment for future generations. Any referral for prosecution resulting from continued failure to comply with the law will be accompanied by this Agency's recommendation that the prosecuting agency seek the maximum penalties allowable under law.

In the very near future, the Illinois Environmental Protection Agency will be releasing a list of all hazardous waste management facilities that failed to submit required proof of financial responsibility. Your prompt and satisfactory response to this communication is urged.

Sincerely,

A handwritten signature in cursive script, reading "R. A. Kuykendall".

Mr. Robert A. Kuykendall
Manager
Division of Land Pollution Control

RGK:qml/7500c/44-45

INSPECTION REVIEW FORM

NAME OF FACILITY: Burgess-Norton Manufacturing Co.ID NO. ILDD062406038LOCATION: (Address): Geneva, Illinois

OPERATION:

G

T

TSD

(Circle Appropriate)

INSPECTOR

S

F

J

DATE OF INSPECTION: 1/19/82NAME OF REVIEWER & DATE: Dana Arnold 4/5/82

COMPLIANCE STATUS

(circle one)

IN

OUT

VIOLATION CLASSIFICATION:

None

I

II

III

STATE ACTION: 2/5/82 - letter sent to facility listing violations.2/5/82 - facility responded. in compliance

RECOMMENDED ACTION:

NONEMONITOR STATE

LETTER

ADMINISTRATIVE COMPLAINT

REFERRAL

ASSIGNEE: _____

DATE ASSIGNED: _____

cc: Unit Inspection Log



217/782-5544

July 22, 1983

Certified Mail
Return Receipt Requested

Burgess-Norton Manufacturing Company
737 Payton Street
Geneva, Illinois 60134

Attn: Frank J. Smith, Plant Chemist
ILD062406038

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Proof of financial responsibility as discussed above was to have been supplied to the Director of the Illinois Environmental Protection Agency. However, it appears that a hazardous waste management facility in your organization has failed to comport with the law by failing to submit the required financial assurances to the Illinois Environmental Protection Agency. The name of the facility in question is Burgess-Norton Manufacturing Company, located at 737 Payton Street, Geneva, Illinois 60134.

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Please take notice that a violation of the Illinois Environmental Protection Act or any regulations adopted thereunder may subject the violator to a civil penalty not to exceed \$10,000 for said violation and an additional penalty not to exceed \$1,000 for each day during which the violation continues. Furthermore, certain violations of the Illinois



Page 2

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In the very near future, the Illinois Environmental Protection Agency will be releasing a list of all hazardous waste management facilities that failed to submit required proof of financial responsibility. Your prompt and satisfactory response to this communication is urged.

Sincerely,

A handwritten signature in cursive script, reading "R. G. Kuykendall".

Mr. Robert G. Kuykendall
Manager
Division of Land Pollution Control

RGK:qm1/7500c/44-45

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

LESTER T. MOATE
EXECUTIVE VICE PRESIDENT
PHONE (312) 645-1622

December 21, 1982

RCRA Activities
U.S. EPA - Region V
P.O. Box 3587A
Chicago, Illinois 60690-3587

Attn: RCRA Financial Requirements

Re: Hazardous Waste Facility
Liability Requirements

Dear Sir:

I am the chief financial officer of AMSTED Industries Incorporated, 3700 Prudential Plaza, Chicago, Illinois 60601. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

1. Burgess-Norton Mfg. Co.
737 Peyton Street
Geneva, IL 60134
EPA I.D. No. ILD062406038 PAIG
2. Burgess-Norton Mfg. Co.
E. L. Anderson Boulevard
P. O. Box 188
Claremore, OK 74017
EPA I.D. No. OKD990750028

WASTE MANAGEMENT BRANCH (5AHWM)
ENVIRONMENTAL PROTECTION AGENCY
RECEIVED
ENVIRONMENTAL PROTECTION AGENCY

Amsted
INDUSTRIES

3. Diamond Chain Company
402 Kentucky Avenue
P. O. Box 7045
Indianapolis, IN 46207
EPA I.D. No. IND006067888
4. Griffin Pipe Products Co.
2601 Ninth Avenue
P. O. Box 157
Council Bluffs, IA 51501
EPA I.D. No. IAD022079446
5. Griffin Pipe Products Co.
1100 W. Front Street
Florence, NJ 08518
EPA I.D. No. NJD003951985
6. Griffin Pipe Products Co.
Adams Street
P. O. Box 740
Lynchburg, VA 24505
EPA I.D. No. VAD000800532

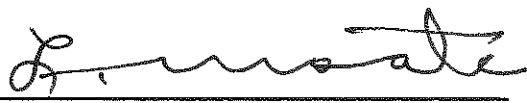
This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on September 30. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended September 30, 1982:

| | | |
|-----|--|---------------|
| 1. | Amount of annual aggregate liability coverage to be demonstrated | \$ 8,000,000 |
| *2. | Current assets | \$207,206,000 |
| *3. | Current liabilities | \$ 80,107,000 |

| | | | |
|------|--|---------------|-----|
| 4. | Net working capital (line 2 minus line 3) | \$127,099,000 | |
| *5. | Tangible net worth | \$359,749,000 | |
| *6. | If less than 90% of assets are located in the U.S., give total U.S. assets | \$ | |
| | | Yes | No |
| 7. | Is line 5 at least \$10 million? | <u>X</u> | ___ |
| 8. | Is line 4 at least 6 times line 1? | <u>X</u> | ___ |
| 9. | Is line 5 at least 6 times line 1? | <u>X</u> | ___ |
| *10. | Are at least 90% of assets located in the U.S.? If not, complete line 11. | <u>X</u> | ___ |
| 11. | Is line 6 at least 6 times line 1? | ___ | ___ |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.



L. T. Moate
Executive Vice President

Date: 12/21/82



200 EAST RANDOLPH DRIVE
CHICAGO, IL 60601
312 565-1500

December 27, 1982

AMSTED Industries Inc.
3700 Prudential Plaza
Chicago, Illinois 60601

We have examined the consolidated statement of financial position of AMSTED Industries Incorporated (the Company) and its subsidiary companies as of September 30, 1982, and the related consolidated statements of results of operations and of changes in financial position for the fiscal year then ended, and have issued our report thereon dated October 19, 1982 appearing on page 12 of the Company's 1982 Annual Report to Stockholders. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not examined any financial statements of the Company as of any date or for any period subsequent to September 30, 1982. Therefore, we are unable to and do not express any opinion on any financial statements as of any date or for any period subsequent to September 30, 1982.

As specified in Subpart H of 40 CFR Part 265, we have compared the tangible net worth (defined as total stockholders' equity less excess of cost of acquired assets over values assigned) and consolidated current assets and current liabilities as of September 30, 1982, which are disclosed in the December 21, 1982 letter from Mr. L. T. Moate, AMSTED's chief financial officer, to the United States Environmental Protection Agency, to the financial statements referred to above and found such amounts to be in agreement. In connection with our examination referred to in the preceding paragraph, we determined that total assets located in the United States exceeded 90% of total assets and agreed such information to the representations made in the letter referred to in the preceding sentence.

In connection with the procedures noted above, no matters came to our attention that caused us to believe that the specified information should be adjusted. It is understood that this report is solely for your information and is not to be referred to or distributed for any purpose other than distribution to the agency listed in the preceding paragraph.

Yours very truly,

Price Waterhouse

**B. Permit Application
/Post Permit**

Permit No. 1992-IPP-17-BN
Part I

CITY OF GENEVA

DEPARTMENT OF PUBLIC WORKS

GENERAL WASTEWATER DISCHARGE PERMIT

EXPIRATION DATE: January 1, 1995

FINAL SPECIFICATIONS, APPLICATION
AND SUPPORTING DOCUMENTS

PREPARED BY: Burgess-Norton Mfg. Co. Plant No. 1

SUBJECT: BURGESS-NORTON MFG. CO. PLANT NO. 1 -
INDUSTRIAL PRETREATMENT PROGRAM

PERMITEE TO OPERATE:

Burgess-Norton Mfg. Co. Plant No. 1
737 Peyton Street
Geneva, Illinois 60134

In Compliance with the provisions of the City of Geneva General Pretreatment Program Ordinance, the above-named permittee is hereby authorized to discharge at the above location to the Geneva Sanitary Sewer System in accordance with the conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the City of Geneva not later than 90 days prior to the expiration date.

Permittee facilities are described as follows:

An industrial user involved in the manufacture of wrist and piston pins with a daily average wastewater flow of 5,252 to 21,720 gallons. Pretreatment consists of a 15,700 gallon rectangular clarifier, an 11,000 gallon mixing tank, and a sludge holding tank. The system utilizes a settling/skimming mode of clarification operation, with pH adjustment and chlorination occurring prior to discharge to City of Geneva sanitary sewer. Sludge generated by the treatment system is disposed of as a special waste IEPA permit numbers (812563) and (950170).

THE STANDARD CONDITIONS OF ISSUANCE INDICATED MUST BE COMPLIED WITH IN FULL. PLEASE READ ALL CONDITIONS CAREFULLY.

CITY OF GENEVA PUBLIC WORKS DEPARTMENT

Thomas Talsma
Thomas Talsma
Director of Public Works

1-6-92
Dated

CITY OF GENEVA
PUBLIC WORKS DEPARTMENT
GENERAL WASTEWATER DISCHARGE PERMIT
DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

From the effective date of this permit until January 1, 1995 the wastewater from this facility shall meet all of the following limits. Additionally, the wastewater shall be monitored and limited at all times as follows:

| SANITARY (Domestic) FLOWS...(QD)= 11,271 gpd | | | | |
|--|-----------------------------|--------------------------------|----------------------------------|-------------------------|
| REGULATED PROCESS FLOWS.....(Q1)= 5,252 gpd | | | | |
| TOTAL FLOWS.....(QT)= 16,523 gpd | | | | |
| PARAMETER | City 1-Day max (mg/l) | Federal 1-Day max (mg/l) | Federal Monthly Avg (mg/l) | SAMPLE (1) FREQUENCY |
| Aluminum | 700.0 | | | Annual |
| Arsenic | 0.5 | | | Annual |
| Cadmium, total | -- | 0.69 | 0.26 | Semi-annual |
| Chromium, total hexa- valent, plus total trivalent | 2.0 | | | Annual |
| Chromium, total hexa- valent | 2.0 | 2.77 | 1.71 | Semi-annual |
| Copper, total | 0.8 | 3.38 | 2.07 | Semi-annual |
| Cyanide, total by distillation | 1.5 | 1.2 | 0.65 | Semi-annual |
| Iron, total | 7.5 | | | Annual |
| Lead | 0.2 | 0.69 | 0.43 | Semi-annual |
| Manganese, total | 12.0 | | | Annual |
| Mercury | 0.025 | | | Annual |
| Nickel | 3.0 | 3.98 | 2.38 | Semi-annual |
| Oil, total | 75.0 | | | Annual |
| Suspended solids | 350.0 | | | Annual |
| Phenol | 0.25 | | | Annual |
| Zinc, total | 0.75 ? | 2.61 | 1.48 | Semi-annual |
| 5-day B.O.D. | 275.0 | | | Daily |
| pH | 6-9 units | | | Daily |
| Silver | -- | 0.43 | 0.24 | Semi-annual |
| TTO | -- | 2.13 | -- | Semi-annual |

- Notes: 1) Sample frequency to be varied at the discretion of the Public Works Department.
2) All metals and cyanide to be reported as total
3) The City may revise the frequency of sampling or parameters sampled based on the analytical results submitted by the permittee.
4) All samples shall be analyzed using procedures outlined in 40 CFR Part 13 of the USEPA Federal Register.
5) All samples shall be flow proportional composite samples except for pH, total Phenols, Oil & Grease, Sulfide, Volital Organics and cyanide which shall be a grab sample.

CITY OF GENEVA

DEPARTMENT OF PUBLIC WORKS

GENERAL WASTEWATER DISCHARGE PERMIT

STANDARD CONDITIONS

1: The issuance of this permit does not relieve the permittee of the responsibility of complying with the City of Geneva Ordinance No. 85-15 of the Geneva Municipal code and all applicable State and Federal Regulations regarding industrial pretreatment, or the Federal Clean Water act of 1977.

2: For any process changes to be made to the existing facilities, plans will be submitted to the City for review and approval prior to the issuance of a City of Geneva building permit.

3: The discharge of any of the enclosed list of Priority Pollutants to the City of Geneva Wastewater treatment plant is strictly prohibited (except as specified in Part II of this permit).

4: This Permit is issued solely for the discharge(s) indicated and based upon the information contained in the application made for the indicated discharge(s). The City of Geneva should be notified of any operational changes which vary the quantity or quality of the sewer discharge.

5: The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.

6: There shall be no deviations from the approved pretreatment facility plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the City and a supplemental written permit issued.

7: The permittee shall allow any agent duly authorized by the City upon the presentation of credentials:

a. to enter at reasonable times, the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.

b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.

c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.

e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

8: The issuance of this permit:

a. does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringements of Federal, State or local regulations;

b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;

c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;

d. does not take into consideration or attest to the structural stability of any units or parts of the project;

e. in no manner implies or suggests that the City (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.

9: These standard conditions shall prevail unless modified by special conditions.

10: The City may file a complaint with the City Council for suspension or revocation of a permit;

a. Upon discovery that the permit application or any other required documents misrepresentation, misinformation or false statements or that all relevant facts were not disclosed; or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the City, as well as being subjected to civil penalties and relief.

b. upon finding that any standard or special conditions have been violated; or

c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.

d. after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations.

11: The Industrial User shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analyses made by or in behalf of the user in connection with its discharge.

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

12: Except for data determined to be confidential under Chapter 25 - Article III Sec. 25-82 of the City Ordinance, all reports required by this permit shall be available for public inspection at the office of the Public Works Director.

13: For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:

- a. The exact place, date, method, and time of sampling; and the name of the person(s) taking the sample.
- b. The dates the analyses were performed;
- c. The person(s) who performed the analyses;
- d. The analytical techniques/methods used; and
- e. The results of all required analyses.

14: No Industrial User shall increase the use of potable or process water, or in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

15: The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

16. All reports required by this permit shall be signed by a principal executive officer of the Industrial User, or his designee.

17. Sewer discharge permits are issued to specific user for a specific operation and are not assignable to another user or transferrable to any other location without the prior written approval of the City. Sale of an Industrial User shall obligate

the purchaser to seek prior written approval of the City for continued discharge to the sewerage system.

18. The terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in the City's Ordinance, are modified or other just cause exists.

This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.

The terms and conditions may be modified as a result of EPA promulgating a new Federal Pretreatment Standard.

Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance if necessary.

19: The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

20: The Industrial User shall notify the City immediately upon any accidental or slug discharge to the sanitary sewer, Chapter 25 Article III Sec. 25-71. Formal written notification discussing circumstances and remedies shall be submitted to the City within fifteen (15) days of the occurrence.

21. The Industrial User shall notify the City prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial process. Formal written notification shall follow within thirty (30) days of such introduction.

22. Any upset experienced by the Industrial User of its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the City's Ordinance shall be reported to the City within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed within five (5) days.

23. The Industrial User will be required to sample its wastewater for the pollutants specified in Part II and report compliance. Any reasons for not complying and any steps being taken by the User to comply shall be part of the Bi-Annual Report.

24. The Industrial User shall maintain records of all information resulting from any monitoring activities for a minimum of three years. These records shall be available for inspection and copying by the Control Authority.

METAL FINISHING (40 CFR 433 and 413)

CATEGORICAL PRETREATMENT STANDARDS FOR INDIRECT DISCHARGERS

Federal Register Citation

| | |
|---------------------------|---|
| Proposed Rule | - August 31, 1982, Vol. 47, page 38462 |
| Final Rule | - July 15, 1983, Vol. 48, page 32462 |
| Amendment | - September 15, 1983, Vol. 48, page 41409 |
| Correction | - September 26, 1983, Vol. 48, No. 187, pages 43680-43682 |
| Regulation Effective Date | - August 29, 1983 |

Subcategories

None - limits are concentration based and can be applied to all metal finishing process discharges.

Pollutants with Numerical Limits

PSES

Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, Cyanide (total), TTO, Cyanide (A)*

*Amenable cyanide limit may apply in place of total cyanide limit.

Regulation Effective Date - August 29, 1983

Due Date of Baseline Monitoring Report - June 25, 1983
(Electroplating)
- February 24, 1984
(Metal Finishing)

Date of Compliance -

| | |
|---|--|
| - PSES for TTO (based on management practices only) | June 30, 1984 (July 10, 1985 for plants covered by Part 420) |
| - PSES for Metals, Cyanide, and TTO (based on management practices followed by precipitation/clarification) | February 15, 1986 |
| - PSNS | From commencement of discharge |

FINAL RULE

Who is covered: Integrated metal finishing facilities (captive electroplaters)

| <u>Pollutant</u> | (PSES)* | |
|------------------|-------------------|---------------------|
| | <u>1-Day Max.</u> | <u>Monthly Ave.</u> |
| Cyanide (Total) | 1.20 | 0.65 |
| Copper | 3.38 | 2.07 |
| Nickel | 3.98 | 2.38 |
| Chromium | 2.77 | 1.71 |
| Zinc | 2.61 | 1.48 |
| Lead | 0.69 | 0.43 |
| Cadmium | 0.69 | 0.26 |
| Silver | 0.43 | 0.24 |
| Total Metals (1) | | |
| TTO (2) | (3) | (3) |

(1) Total Metals is not included.

(2) TTO is the total toxic organics, which is the summation of all quantifiable values greater than 0.01 mg/l for the specified toxic organics in the regulation.

(3) The TTO limitation for the integrated facility under the electroplating point source category is less stringent than the TTO limitation under the metal finishing category. If you are an integrated facility and therefore, a member of the metal finishing point category, your TTO limitation regardless of the amount of flow you discharge is as follows:

| <u>TTO Limitation</u> | <u>Compliance Date</u> |
|-----------------------|------------------------------|
| 4.57 mg/l | June 30, 1984 |
| 4.57 mg/l | July 10, 1984 (iron & steel) |
| 2.13 mg/l | February 15, 1986 |

*PSES - Pretreatment standards for existing sources.

Comments:

Existing independent job shop electroplaters and printed circuit board manufacturers must only comply with the electroplating regulations. All other electroplating subcategories are now covered by both the electroplating and metal finishing standards.

If a plant is engaged in one or more of the following operations in addition to metal finishing, the following regulations take precedence over metal finishing regulations when overlap occurs.

CITY OF GENEVA
DEPARTMENT OF PUBLIC WORKS
GENERAL WASTEWATER DISCHARGE PERMIT
SPECIAL CONDITIONS

SPECIAL CONDITION I:

July & January

The permittee, once determined to be in compliance with the appropriate pretreatment standards, shall submit a "Bi-Annual Compliance Report" during the months of ~~June~~ and ~~December~~. The report shall indicate the average and maximum daily flows of the facility for the last 6 months, noting all daily flows which during the reporting period exceeded the average daily flow reported. The December and June report shall contain the concentration of the pollutants in the effluent which are limited by the City of Geneva pretreatment standards.

SPECIAL CONDITION II:

This permit allows for the use and storage of the following listed raw materials and chemicals. Should any new (other than those listed) raw materials or chemicals be used or stored, or if the quantity of the listed materials increased by 10% or more, the City shall be notified in writing prior to this change in inventory. See Attachment #1

SPECIAL CONDITION III

Within six (6) months after the issuance date of this permit Burgess Norton Manufacturing Corp. Plant One shall revise its Accidental Discharge Prevention Plan and submit it to the City for approval. The Accidental Discharge Prevention Plan shall consist of in detail the following:

A. All chemicals hauled off-site for reclamation, incineration, etc... specifying method of disposal for each chemical.

B. a commitment by the permittee to send copies of all IEPA "Uniform Hazardous Waste Manifest" Forms completed EPA Form (8700-22, 3-84) on a monthly basis.

C. Spill containment counter measure plan(s) for preventing spillage or leakage of any hazardous chemicals into the sanitary sewer.

PRIORITY POLLUTANTS

I. Phthalate esters:

Dimethyl phthalate(606)(625)
Diethyl phthalate(606)(625)
Di-n-butyl phthalate(606)(625)

Di-n-octyl phthalate(606)(625)
Bis(2-ethylhexyl)phthalate(606)(625)
Butylbenzyl phthalate(606)(625)

II. Haloethers

Bis(2-chloroethyl)ether(611)(625)
Bis(2-chloroisopropyl)ether(611)(625)
2-chloroethylvinyl ether(601)(624)

Bis(2-chloroethoxy)methane(611)(625)
4-chlorophenylphenyl ether(611)(625)
4-bromophenylphenyl ether(611)(625)

III. Chlorinated hydrocarbons:

Hexachloroethane(612)(625)
Hexachlorobutadiene(612)(625)
Hexachlorocyclopentadiene(612)(625)
1,2-dichlorobenzene(601)(602)(612)(625)

1,3-dichlorobenzene(601)(602)(612)(625)
1,4-dichlorobenzene(601)(602)(612)(625)
1,2,4-trichlorobenzene(612)(625)
Hexachlorobenzene(612)(625)
2-chloronaphthalene

IV. Nitroaromatics and Isophorone:

Nitrobenzene(609)(625)
2,6-dinitrotoluene(604)(625)

2,4-dinitrotoluene(604)(625)
Isophorone(609)(625)

V. Nitrosoamines:

N-nitrosodimethylamine(607)(625)

N-nitrosodipropylamine(607)(625)

N-nitrosodiphenylamine(607)(625)

VI. Dioxin:

2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)(613)(625)

VII. Benzidines:

Benzidine(605)(625)

3,3-dichlorobenzidine(605)(625)
1,2-diphenylhydrazine(625)

VIII. Phenols:

Phenols(604)(625)
2,4-dimethylphenol(604)(625)
2-chlorophenol(604)(625)
2,4-dichlorophenol(604)(625)
2,4,6-trichlorophenol(604)(625)

Pentachlorophenol(604)(625)
4-chloro-3-methylphenol(604)(625)
2-nitrophenol(604)(625)
4-nitrophenol(604)(625)
2,4-dinitrophenol(604)(625)
4,6-dinitro-2-methylphenol(604)(625)

Polynuclear aromatic:

Acenaphthene(610)(625)
Fluoranthene(610)(625)
Naphthalene(610)(625)
Benzo(a)anthracene(610)(625)
Benzo(a)pyrene(610)(625)
Benzo(b)fluoranthene(610)(625)
Benzo(k)Fluoranthene(610)(625)
Chrysene(610)(625)

Acenaphthylene(610)(625)
Anthracene(610)(625)
Benzo(g,h,i)perylene(610)(625)
Fluorene(610)(625)
Phenanthrene(610)(625)
Dibenzo(a,h)Anthracene(610)(625)
Indeno(1,2,3-cd)pyrene(610)(625)
Pyrene(610)(625)

X. Pesticides & PCB's:

Aldrin(608)(625)
Dieldrin(608)(625)
Chlordane(608)(625)
DDD(608)(625)
DDE(608)(625)
DDT(608)(625)
A-endosulfan(608)(625)
B-endosulfan(608)(625)
Endosulfan(608)(625)
Endrin(608)(625)
Endrin aldehyde(608)(625)
Heptachlor(608)(625)
Toxaphene(608)(625)

Heptachlor epoxide(608)(625)
Alpha-BHC(608)
Beta-BHC(608)(625)
Delta-BHC(608)(625)
Gamma-BHC(608)(625)
Toxaphene(608)(625)
Aroclor 1242(608)(625)
Aroclor 1254(608)(625)
Aroclor 1221(608)(625)
Aroclor 1232(608)(625)
Aroclor 1248(608)(625)
Aroclor 1260(608)(625)
Aroclor 1016(608)(625)

XI. Purgeables:

Benzene(602)(624)
Chlorobenzene(601)(602)(624)
Toluene(602)(624)
Ethylbenzene(602)(624)
Carbon tetrachloride(601)(624)
1,2-dichloroethane(601)(624)
1,1,1-trichloroethane(601)(624)
1,1-dichloroethane(601)(624)
1,1,2-trichloroethane(601)(624)
1,1,2,2-tetrachloroethane(601)(624)
Chloroethane(601)(624)
Chlorodibromomethane(601)(624)
Tetrachloroethylene(601)(624)

Chloroform(601)(624)
1,1-dichloroethylene(601)(624)
1,2-transdichloroethylene(601)(624)
1,2-dichloropropane(601)(624)
1,1-dichloropropylene(601)(624)
Methylchloride(601)(624)
Methylenechloride(601)(624)
Methylbromide(601)(624)
Bromoform(601)(624)
Dichlorobromomethane(601)(624)
Trichloroethylene(601)(624)
Vinyl chloride(601)(624)

XII. Acrolein & Acrylonitrile:

Acrolein(603)(624)

Acrylonitrile(603)(624)

XIII. Inorganics:

Antimony
Arsenic
Beryllium
Cadmium
Chromium
Copper
Lead

Cyanide

Mercury
Nickel
Selenium
Silver
Thallium
Zinc
Asbestos

FIELD REPORT

Incident Number 891840Notify: ILLINOIS EMERGENCY SERVICES & DISASTER AGENCY
1-800-782-7860 or 217/782-7860Date: 9/20/89Time: 1546Rec'd by: #89

- 1) Caller: LEWIS ROMERO 2) Call back number: (713) 493-5000
- 3) Caller represents: AMSTED IND
- 4) Type of incident: ☐ Fire ☐ Explosion ☒ Leak or spill
☐ Gas or vapor cloud ☐ Water involvement ☐
- 5) Incident location: Street 737 PEYRON City GENEVA ☒ In ☐ Near
County KANE Milepost : ☐ R.R. ☐ River ☐ Highway
Section Township Range
- 6) Area involved: ☐ Highway ☐ Waterway ☐ Rail ☒ Fixed facility ☐ Air ☐ Other
- 7) Material(s) involved: FUEL OIL
Form: ☐ Gas ☒ Liquid ☐ Semi-Solid ☐ Solid ☐ Pesticide ☐ Radioactive
UN/NA # CAS #
Is this a 302(A) Extremely Hazardous Substance? ☐ Yes ☐ No ☐ Unknown CERCLA? ☐ Yes ☐ No ☐ Unknown
Is this a RCRA Hazardous Waste? ☐ Yes ☐ No ☐ Unknown If Yes, is this a RCRA regulated facility? ☐ Yes ☐ No
- 8) Container: ☐ Truck ☐ RR Car ☐ Above ground tank ☒ Underground tank ☐ Drum ☐ Pipeline
☐ Other: Container Size:
- 9) Amount released: UNK Rate of release: /minute
- 10) Cause of release: POSSIBLE OVERFILL
- 11) Extent of spill: UNK ☐ Sq. Ft. ☐ Sq. Yd.
- 12) Incident: ☐ Occurred Date: 9/1/89 Time:
☒ Discovered Date: 9/16/89 Time:
- 13) Local emergency unit(s) contacted: ☐ Fire ☐ On-scene: ☐ Fire
☐ Sheriff ☐ Sheriff
☐ Police ☐ Police
☐ Local ESDA ☐ Local ESDA
☐ Other ☐ Other
- 14) On-scene contact: Phone # ()

071070

15) Number injured: 0 Hazmat related? ☐ Yes ☐ No Where taken: _____

16) Public health risks and/or precautions taken; including # evacuated: NONE

17) Assistance needed from State Agencies: NONE

18) Containment/cleanup actions and plans: NONE AT THIS

19) Weather: ☐ Sunny ☐ Rain ☐ Snow ☒ Overcast ☐ Partly Cloudy ☐ Night
Temperature: _____ F° ~~Wind direction:~~ _____ Wind speed: _____

20) Responsible party: ARMSTRONG INDUSTRIAL

Contact person: FRANK SMITH Phone# (312) 232-4100

Mailing address: 3700 PRUDENTIAL PLAZA
CHICAGO, IL, 60601

21) Narrative/Comments: _____

1536- FAX ERU

1538- FAX REG-5



P486652598

217/782-6761

Refer to: # 0890350008 -- Kane County
Burgess-Norton Mfg. Co.
ILD 062406038
RCRA - Permits

May 6, 1988

Burgess-Norton Mfg. Co.
737 Peyton Street
Geneva, Illinois 60134

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKH:6ks/1238j/1244j/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

5HS-12

20 APR 1988

Mr. Frank Smith
Burgess Norton Manufacturing
737 Peyton Street
Geneva, Illinois 60134

Re: Land Disposal Restrictions
Burgess Norton Manufacturing
ILD 062 406 038

Dear Mr. Smith:

On February 18, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Gertrud Matuschkovitz of my staff at (312) 353-7921.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/IN Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

5HS-12:GMATUSCHKOVITZ:4/19/88:ev

DISK #1

CONCURRENCES

| SYMBOL | | | | | | | |
|---------|---------|---------|---------|--|--|--|--|
| SURNAME | EV | gm | 21 | | | | |
| DATE | 4-19-88 | 4-19-88 | 4/19/88 | | | | |

MEMORANDUM

SUBJECT: Recommendation to Withdraw RCRA Administrative
Order Issued Amsted Industries, Inc.

FROM: Basil G. Constantelos
Director
Waste Management Division

Robert B. Schaefer
Regional Counsel

TO: Valdas V. Adamkus
Regional Administrator

Attached for your review and signature is a motion and order withdrawing a RCRA administrative order issued to Amsted Industries, Inc., Geneva, Illinois. The Illinois Environmental Protection Agency (IEPA) referred this matter to the Waste Management Division in March 1984. Upon IEPA's recommendation Region V issued a RCRA administrative order requiring Amsted to comply with Illinois' financial and liability assurances requirements for hazardous waste management facilities. Upon receipt of the order Amsted provided Region V with information which demonstrates that there have been no Illinois regulatory violations. Amsted's compliance status has been verified by IEPA, therefore, we believe the administrative order should be withdrawn.

WJG 8/31/84

WJG 8/31

*26W8/24/84
RF 8/16/84*

*DAS
8/30/84*

WJG 8/17

WJG 8/20/84

WJG 8/30/84

*WJG 8/27
WJG 8/27/84*

WJG 8/27

WJG 8/27/84

6 SEP 1984

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

C.T. Corporation Systems
Registered Agent for
Amsted Industries, Inc.
208 South LaSalle
Chicago, Illinois 60604

Re: Motion to Withdraw Complaint
Burgess-Norton Mfg., Co.
Geneva, Illinois
Docket Number V-W-84-R-042

Dear Mr. Sir:

This letter is to advise you that the United States Environmental
Protection Agency has withdrawn its Compliant and Compliance Order
V-W-84-R-042. A fully executed Motion to Withdraw Compliant is
enclosed for your files.

Very truly yours,

ORIGINAL SIGNED BY
HAK CHO FOR

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosure

cc: Frank J. Smith ✓
Burgess-Norton Mfg., Inc.

R.H. Wellington ✓
Amsted Industries

Bill Radlinski IEPA Springfield ✓

Don Gimbel, IEPA Maywood ✓

bcc: Wayne Pearson, w/enclosure ✓
Pierre Talbert, w/enclosure ✓
Mary Langer, w/original ✓
TPCS Secretary, w/enclosure ✓
B. Springer, w/enclosure ✓
Melissa Friedland, HQ-WH-527 ✓

MINER/dmr

6-6135

8-30-84

WMD
DIRECTOR

WMB
CHIEF

TPS
CHIEF

STU #3
CHIEF

STU #2
CHIEF

STU #1
CHIEF

AUTHOR

TYPIST

INITIALS

DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

| | | |
|-------------------------|---|-------------------------|
| In the Matter of: |) | |
| |) | Docket No. V-W-84-R-042 |
| Amsted Industries, Inc. |) | |
| 737 Peyton Street |) | |
| Geneva, Illinois |) | |
| ILD 062406038 |) | |
| |) | |

MOTION TO WITHDRAW COMPLAINT

Pursuant to 40 CFR §§22.14(e) and 22.16(a), the Director of the Waste Management Division, Region V, United States Environmental Protection Agency, Complainant herein, moves the Regional Administrator for withdrawal without prejudice of the complaint filed against Amsted Industries, Inc., Geneva, Illinois, Respondent herein, on May 21, 1984.

In support of his motion Complainant states:

1. By letter dated March 5, 1984, the Illinois Environmental Protection Agency (IEPA) requested the United States Environmental Protection Agency to initiate an enforcement action against Respondent for violations of 35 Ill. Adm. Code §§725.143 and 725.147. These regulatory provisions require the owners and operators of Illinois hazardous waste treatment, storage and disposal facilities to acquire and maintain financial and liability assurances for the life of the facility. IEPA stated in its letter that Respondent failed to file the necessary documents to verify compliance with these regulatory requirements.

2. Upon receipt of the complaint Respondent, by letter dated May 23, 1984, submitted to Complainant photocopies of documents submitted to IEPA which verify compliance with the provisions of 35 Ill. Adm. Code §§725.143 and 725.147. Upon receipt of this information, Complainant determined that the necessary financial and liability assurances had, in fact, been submitted to IEPA and that IEPA has reclassified Respondent as a complying facility.

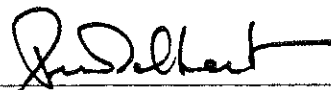
3. Complainant has verified that Respondent is in compliance with 35 Ill. Adm. Code §§725.143 and 725.147.

4. No answer has been filed in this matter.

Wherefore, Complainant moves the Regional Administrator to grant his motion for withdrawal of the complaint without prejudice.

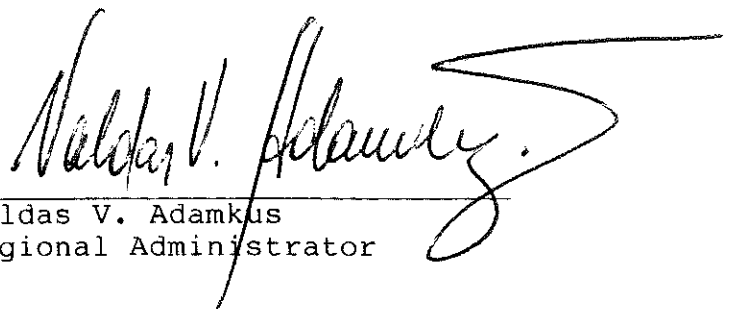
Respectfully submitted,

Date: August 16, 1984


 Pierre Talbert
 Associate Regional Counsel
 Attorney for Complainant

So Ordered.

Date: August 31st, 1984


 Valdas V. Adamkus
 Regional Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

| | | |
|-------------------------|---|-------------------------|
| In the Matter of: |) | |
| |) | Docket No. V-W-84-R-042 |
| Amsted Industries, Inc. |) | |
| 737 Peyton Street |) | |
| Geneva, Illinois |) | |
| ILD 062406038 |) | |
| |) | |

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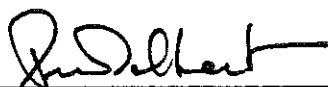
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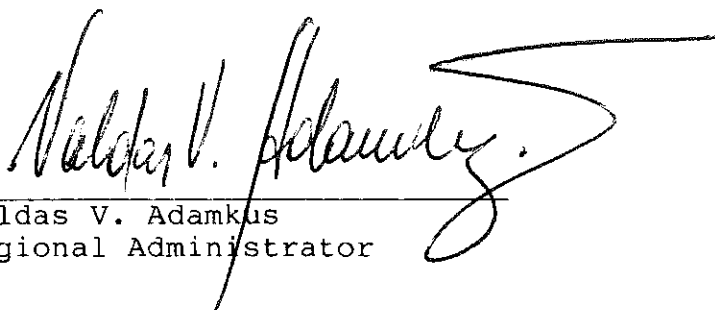
Date: August 16, 1984



Pierre Talbert
Associate Regional Counsel
Attorney for Complainant

So Ordered.

Date: August 31st, 1984



Valdas V. Adamkus
Regional Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 13, 1984

SUBJECT: Burgess-Norton/Amsted Industries
ILD 062406038

FROM: Wayne Pearson *Wayne Pearson*
STU #1

TO: Enforcement File

In a letter dated March 5, 1984, IEPA referred to U.S. EPA a recommendation for enforcement action against the subject facility. The facility was alleged to be in violation of 35 Ill. Adm. Code §725.143 and §725.147 which pertain to requirements to provide financial responsibility for facility closure and financial responsibility for injury to third persons, respectively. The IEPA referral letter stated: "This Agency (IEPA) has searched its records and finds that the appropriate financial assurance documents have not been filed with the IEPA." U.S. EPA also checked its records and found no documents.

In a letter dated May 23, 1984, Respondent submitted to U.S. EPA copies of financial assurance documents. Respondent claimed that the appropriate documentation had been submitted to IEPA.

We informed IEPA of this situation and asked them to double-check their files. IEPA found copies of the documents misfiled and determined that the facility is in compliance with the regulations cited above. Our technical staff has also reviewed the documents and has reached the same conclusion.

Had the existence of these documents been known to IEPA, they would not have made the referral. Had the documents been known to us, we would not have issued the compliance order. Therefore, I recommend that we withdraw the compliance order.

cc: Pierre Talbert

RECORD OF
COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

File

FROM:

Zetta

DATE

6/11/84

TIME

SUBJECT

Omsted Industries - ICD062406038

SUMMARY OF COMMUNICATION

I talked with Roma, IEPA about the condition of Omsted's financial instrument. He said that the documents are in order. Therefore the facility is in compliance with the financial requirements.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

RECORD OF
COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(REMOVE IF ITEM CHECKED ABOVE)

TO:

File

FROM:

Zitta

DATE

6/6/84

TIME

Am

SUBJECT

Amsted Industries, Inc / Burgess-Norton Mfg. Co.

REMARKS OF COMMUNICATION

I talked with Rama, IEPA this morning about the ^{cc} financial documents we received from the Co. in response to our 5/27/84 order.

I asked Rama to review and confirm the condition of the documents because we need State approval or disapproval before a determination is made about the ^{total} penalty.

REMARKS OF ACTION TAKEN OR REQUIRED

Rama will call me tomorrow with confirmation

| | |
|-----------------|-----------------------|
| FACILITY NAME | Burgess - Norton Mfg. |
| FACILITY NUMBER | ILD 062 406 038 |

ENTER COMMENTS HERE (PLEASE DATE AND INITIAL):

NON-STANDARD:

- Notified as Gen. on Aug '80
- Submitted Part A Nov '80
- April 21, '81 Submitted letter requesting de-listing of Fd00 and Fd12. They do not use cyanide.
- Mar 12, 1982 - DSEPA sent Ltr. Acknowledgement Letter.
- April 25, 1982 - De-listing Dd00 and changing Fd12 to Dd02.

Waiting for IEPA ~~to~~ Cont. Mail
Return Receipt. — Receipt not
available. 4/20
& typing 4/20

AMSTED INDUSTRIES

INCORPORATED

3700 PRUDENTIAL PLAZA • CHICAGO, ILLINOIS • 60601

OFFICE OF THE
CHIEF PATENT ATTORNEY

May 23, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Mr. Wayne Pearson
Waste Management Division
Technical Permits and
Compliance Section

RE: Complaint and Compliance Order
Burgess-Norton Mfg. Co.
ILD 062406038

RECEIVED
MAY 23 1984
WASTE MANAGEMENT
BRANCH

Dear Sir:

This is to confirm our telephone conversation regarding the above identified Complaint and Compliance Order.

Enclosed herewith are copies of the financial responsibility for closure costs and liability requirement statements filed on August 2, 1983 and April 5, 1984. Evidence that these statements were received by the Illinois EPA is shown by the attached copy of Certified Mail coupons. We have also enclosed copies of the correspondence received from the IEPA on July 28, 1983 and a communication from Frank Smith located in Geneva, and Ed Brosius an attorney in this office.

It is requested that this matter be settled by dismissal of the complaint because there are no facts to support the charges made.

However, the respondent Burgess-Norton, division of AMSTED Industries Incorporated, requests an informal conference for

Amsted
INDUSTRIES

United States Environmental Protection Agency
May 23, 1984
Page 2

purposes of such said settlement if this letter request is not deemed adequate to achieve the dismissal.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Fred P. Kostka", with a long horizontal flourish extending to the left.

Fred P. Kostka
Chief Patent Attorney

FPK:am
Enc.
cc: W. David Romoser

- **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..

- 2.
- ☐
- RESTRICTED DELIVERY**
-
-
- (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: R.H. Wellington
Amsted Ind.
3700 Prudential Pl. Chi, IL 60611

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

P 593 668
337

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

C. T. Corporation

5. DATE OF DELIVERY

05-23-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

★ GPO: 1982-379-593

RETURN RECEIPT

- **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☐ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..

- 2.
- ☐
- RESTRICTED DELIVERY**
-
-
- (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: C.T. Corporation
Systems - Amsted Indust.
208 S. LaSalle St.
Chicago, IL 60604

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

P611630719

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agentCT Corporation System
208 S. LaSalle Street

5. DATE OF DELIVERY

MAY 22 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

★ GPO: 1982-379-593

RETURN RECEIPT

P 611 630 719

RECEIPT FOR CERTIFIED MAILNO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to C.T. Corporation Systems
Amsted Industries, Inc.

Street and No. 208 S. LaSalle Street

P.O., State and ZIP Code
Chicago, Ill. 60604

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing
to whom and Date DeliveredReturn receipt showing to whom,
Date, and Address of Delivery

TOTAL Postage and Fees \$

Postmark or Date

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

Compliance Order - Burgess-Watson Mfg. - LD 06240 6031

5th Floor

STU #1

5th Floor

STU #1

5th Floor

STU #1

5th Floor

STU #1

5th Floor

STU #1

5th Floor

STU #1

P 593 668 335

RECEIPT FOR CERTIFIED MAILNO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to F. J. Smith c/o
Amsted Ind

Street and No. 737 Peyton St.

P.O., State and ZIP Code
Geneva, IL 60134

Postage \$

Certified Fee

Special Delivery Fee

Restricted Delivery Fee

Return Receipt Showing
to whom and Date DeliveredReturn receipt showing to whom,
Date, and Address of Delivery

TOTAL Postage and Fees \$

Postmark or Date

★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

Bureau - Unit #1

PS Form 3811, July 1982

• **SENDER:** Complete Items 1, 2, 3, and 4.
Add your address in the "RETURN TO"
space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☐ Show to whom and date delivered \$
- ☐ Show to whom, date, and address of delivery .. \$
2. ☐ **RESTRICTED DELIVERY** \$
(The restricted delivery fee is charged in addition
to the return receipt fee.)

TOTAL \$ _____

3. **ARTICLE ADDRESSED TO:** F. Smith c/o
Amsted, End.
737 Peyton St. Geneva, IL 60134

4. **TYPE OF SERVICE:**

- ☐ REGISTERED
- ☒ CERTIFIED
- ☐ EXPRESS MAIL

- ☐ INSURED
- ☐ COD

ARTICLE NUMBER

p 593 668
335

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE

☐ Addressee

☐ Authorized agent

5. **DATE OF DELIVERY**

5-25-82

POSTMARK
(may be on reverse side)

6. **ADDRESSEE'S ADDRESS** (Only if requested)

7. **UNABLE TO DELIVER BECAUSE:**

7a. **EMPLOYEE'S
INITIALS**

RETURN RECEIPT

★ GPO: 1982-379-593

MAY 22 1984

5HW-12

CERTIFIED MAIL # P611 630 719
RETURN RECEIPT REQUESTED

C.T. Corporation Systems, Registered Agent
Amsted Industries, Inc.
208 S. LaSalle Street
Chicago, Illinois 60604

Re: Complaint and
Compliance Order
Burgess-Norton Mfg., Co.
ILD 062406038

Dear Sirs:

Enclosed please find a Complaint and Compliance Order which specify this Agency's determination of certain violations by Burgess-Norton Mfg., Co., a Division of Amsted Industries, Inc., of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. The Complaint and Compliance Order are based on information available to this Agency pertaining to your manufacturing facility at 737 Peyton Street, Geneva, Illinois.

The Complaint and Compliance Order state the reasons for the determination of violations, establish a compliance schedule and assess a civil penalty for the violations. The Complaint and Compliance Order are issued pursuant to section 3008(a) of RCRA (42 U.S.C. §6928(a)).

Accompanying the Complaint and Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the allegations herein, and the assessed penalty, a written request for a hearing is required to be filed with the Regional Hearing Clerk, U.S. EPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your hearing request should also be sent to Pierre Talbert, Office of Regional Counsel, U.S. Environmental Protection Agency at the same address. A request for hearing does not affect your responsibility to answer the Complaint.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of the Complaint you are extended an opportunity to request an informal settlement conference. If you have any questions or desire to request an informal conference for purposes of settlement please contact Mr. Wayne Pearson, Waste Management Division, Technical, Permits, and Compliance Section, 230 South Dearborn Street, Chicago, Illinois 60604, at (312) 886-1772.

Sincerely,

Rosil G. Constantelos
Director, Waste Management Division

Enclosures

cc: Frank J. Smith, Burgess-Horton Mfg., Co.
R.H. Wellington, Amsted Industries, Inc.
Bill Radlaski, IEPA Springfield
Don Gimbel, IEPA Maywood

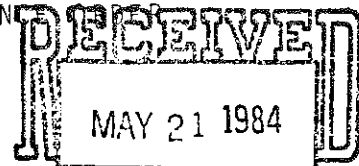
bcc: 4 Denise Reape, TPC5
1 Regional Hearing Clerk, w/Original Order
5 Polk Hill - WM-527
3 Wayne Pearson
2 Pierre Talbert, ORC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:
AMSTED INDUSTRIES, INC.,
BURGESS-NORTON MFG., CO., DIV.
737 PEYTON STREET
GENEVA, ILLINOIS 60134

V-W- 84-R-042
DOCKET NO. _____

COMPLAINT AND
COMPLIANCE



REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

PREAMBLE

This Complaint is issued pursuant to sections 3006(b) and 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA or the Act) (42 U.S.C. §6926(b) and §6928(a)(1), respectively), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter U.S. EPA). The Respondent is the Burgess-Norton Manufacturing Co., Division of Amsted Industries, Inc.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by sections 1006, 2002(a)(1), 3006(b) and 3008 (a)(2) of RCRA (42 U.S.C §§6905, 6912(a)(1), 6926(b) and 6928(a)(2), respectively).

The Administrator of U.S. EPA granted the State of Illinois interim authorization to administer a hazardous waste program pursuant to Section 3006(b) of RCRA (42 U.S.C. §6926(b)) on May 17, 1982 (47 Fed. Reg. 21043). The State regulations applicable to this authorization are 35 Ill. Adm. Code Part 720 et seq. Section 3008(a)(2) of RCRA (42 U.S.C. §6928(a)(2)) provides that the Administrator may enforce State regulations in States authorized to administer a hazardous waste program under Section 3006(b). U.S. EPA has provided notice of this action to the State of Illinois.

FINDINGS OF VIOLATION

1. Respondent owns and operates a facility located at 737 Peyton Street, Geneva, Illinois, which treats, stores or disposes of hazardous waste.
2. Respondent's Peyton Street facility existed before November 19, 1980.
3. Respondent properly notified U.S. EPA of its hazardous waste activity at the Peyton Street facility pursuant to section 3010(a) of RCRA (42 U.S.C. §6930(a)).
4. Respondent properly filed a RCRA Part A application to treat, store or dispose of hazardous waste at its Peyton Street facility pursuant to section 3005(a) of RCRA (42 U.S.C. §6925(a)) and 40 CFR §270.1(b). In addition, Respondent filed amendments to its Part A application dated April 21, 1981, and April 25, 1982.

5. Respondent's Peyton Street facility has interim status pursuant to section 3005(e) of RCRA. See, 40 CFR §270.1(b).

6. U.S. EPA granted interim authorization to the State of Illinois to administer a hazardous waste program on May 17, 1982, pursuant to section 3006(b) of RCRA (42 U.S.C. §6926(b)) and 40 CFR §271 et seq. (47 Fed. Reg. 21043).

7. The provisions of 35 Ill. Adm. Code Part 720 et seq. apply to Respondent's Peyton Street facility.

8. On or about July 22, 1983, the Illinois Environmental Protection Agency (IEPA) notified Respondent that its Peyton Street facility was in violation of 35 Ill. Adm. Code §725.243 [requirements to provide financial assurance for facility closure] and 35 Ill. Adm. Code §725.247 [requirements to demonstrate financial responsibility for injury to third persons].

9. Respondent has failed to comply with the requirements of 35 Ill. Adm. Code §§725.243, 725.247. Specifically, Respondent has failed to establish financial assurance for closure of the Peyton Street facility and has failed to demonstrate financial responsibility for bodily injury and property damage to third persons caused by sudden accidental occurrences arising from the operation of the Peyton Street facility. See, 40 CFR §265.143 and 40 CFR §265.147.

10. Respondent's failure to comply with the provisions of 35 Ill. Adm. Code §725.243 and §725.247 constitutes a continuing violation of those requirements from May 17, 1982.

11. Notwithstanding the violations enumerated at paragraphs 9 and 10, above, the continued operation of the Peyton Street facility is in the public interest upon compliance by Respondent with all applicable provisions of 35 Ill. Adm. Code Part 725, including §725.243 and §725.247, until a final decision on its RCRA permit application has been made by U.S. EPA (or the State of Illinois, if authorized).

ORDER AND CONDITIONS
FOR CONTINUED OPERATION

1. Respondent, having been determined to be in violation of 35 Ill. Adm. Code §§725.243, 725.247, is ordered, pursuant to section 3008(a)(1) of RCRA, to comply with all the applicable provisions of 35 Ill. Adm. Code Part 725 at its Peyton Street facility. In addition, Respondent shall:

- a. Within thirty (30) days of receipt of this Order submit to the Illinois Environmental Protection Agency proof of compliance at its Peyton Street facility with the requirements for financial assurance of closure as required by 35 Ill. Adm. Code §725.243; and
- b. Within thirty (30) days of receipt of this Order submit to the Illinois Environmental Protection Agency proof of compliance at its Peyton Street facility

with the requirements for liability coverage as required
35 Ill. Adm. Code §725.247.

Proof of compliance with this Order shall be submitted on standardized forms promulgated by Illinois Environmental Protection Agency under the authority of 35 Ill. Adm. Code §725.251, along with any additional documentation which may be required. The documentation should be submitted to Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706, Attention: Andy Vollmer. A copy of such submittal shall be sent to U.S. Environmental Protection Agency, 230 S. Dearborn Street, Chicago, Illinois 60604, Attention: Wayne Pearson (5WMB).

2. Notwithstanding any other provision of this Order, an enforcement action may be brought against Respondent pursuant to Section 7003 of RCRA (42 U.S.C. §6973) or any other applicable statutory authority, should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the Peyton Street facility may present an imminent and substantial endangerment to human health or the environment.

3. A civil penalty of \$12,900 is assessed against Respondent for the violations set forth above at its Peyton Street facility pursuant to section 3008(c) and 3008(g) of RCRA (42 U.S.C. §6928(c) and (g), respectively).

NOTICE OF OPPORTUNITY FOR HEARING

The Burgess-Norton Manufacturing Co., Division of Amsted Industries, Incorporated, is hereby notified that the above Order may become final, or a default Order entered upon motion, unless Respondent has requested, in writing, a hearing no later than 30 days from the date this Order is served. You have the right to request a hearing, to contest any material factual allegation set forth in the Complaint, or contest the appropriateness of the assessed penalty.

To avoid having the Compliance Order become final without further proceedings, you must file a written answer to this Complaint with the Regional Hearing Clerk, U.S. EPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of your receipt of this notice. A copy of the answer and any subsequent documents filed in this action should also be sent to the Office of Regional Counsel, at the same address, Attention: Pierre Talbert, Assistant Regional Counsel.

Your answer to the Complaint and Order should clearly and directly admit, deny, or explain each of the factual allegations of which you have any knowledge. The answer should contain: (1) a definite statement of the facts, circumstances or arguments which constitute the grounds of defense; and (2) a concise statement of the facts which you intend to place at issue. The denial of any material fact or the raising of any affirmative defense shall be considered as a request for a hearing.

A copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits accompanies this Complaint (40 CFR Part 22; 45 Fed. Reg. 24367 (1980), as amended by 45 Fed. Reg. 79898 (1980). These regulations are applicable to all proceedings to this administrative action including the filing of any answer.

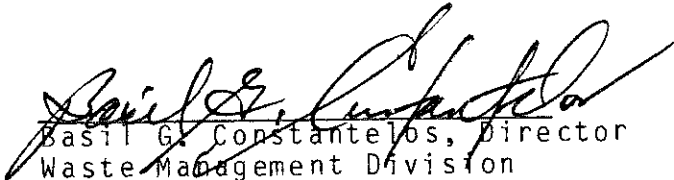
SETTLEMENT CONFERENCE

Whether you request a hearing you may confer informally with U.S. EPA concerning (1) whether the alleged violations occurred as set forth above, or (2) the appropriateness of the compliance schedule or penalty.

You may request an informal settlement conference at any time by contacting this office at the telephone number listed below, however, any such request will not affect the thirty day time limit for responding with an answer to this Complaint and requesting a formal hearing on the violations alleged herein. U.S. EPA encourages you to pursue the possibilities of settlement through an informal conference.

Request for an informal conference should be made to Mr. Wayne Pearson at the above address, telephone number (312) 886-1772.

DATED this 17th day of May 1984.


Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

I hereby certify that I have caused copies of the foregoing Complaint and Order to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and Certified Mail, Return Receipt Requested, postage prepaid, at Chicago, Illinois in envelopes addressed to:

C.T. Corporation Systems
Registered Agent
Amsted Industries, Inc.
208 S. LaSalle Street
Chicago, Illinois 60604

R.H. Wellington, President
Amsted Industries, Inc.
3700 Prudential Plaza
Chicago, Illinois 60611

Frank J. Smith, Plant Chemist
Burgess-Norton Mfg., Co.
Amsted Industries, Inc.
737 Peyton Street
Geneva, Illinois 60134

I have further caused the original of the Complaint and this Certificate of Service to be served on the Regional Hearing Clerk, Office of Regional Counsel, U.S. EPA, Region V at 230 South Dearborn Street, Chicago, Illinois 60604, on the date set forth below.

DATED this 21 day of May, 1984

for Jean Sharp for

Denise Reape, Secretary
Technical, Permits, and
Compliance Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

Burgess-Norton Manufacturing Company
an Illinois corporation
RESPONDENT

)
)
)
) DOCKET NO.
) COMPLAINT AND FINDINGS
) OF VIOLATION
)
)
)
)
)
)

ID Number: ILD062406038

COMPLAINT

This complaint is issued pursuant to Section 3008(a) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. Sec. 6928, and is equivalent to a Compliance Order referred to in that Section. The Complainant is the Regional Administrator, Region V, United States Environmental Protection Agency (U.S. EPA). Based upon information and records maintained by U.S. EPA and Illinois EPA, it has been determined that the above-named Respondent is in violation of RCRA. Specifically, it has been determined the Respondent is in violation of Subtitle C of RCRA, Section 3004(6) (42 U.S.C. Sec. 6924) and regulations 40 CFR Sec. 265.143, as embodied in 35 Ill. Adm. Code Sections 725.240(a) and 725.243.

FINDINGS

This determination is based on the following findings of violation:

1. Pursuant to 35 Ill. Adm. Code 725.240(a) (40 CFR 265.140(a)), certain hazardous waste facilities must file and comply with the financial assurance provisions of 35 Ill. Adm. Code 725.243 (40 CFR 265.143).

2. Respondent is a hazardous waste facility that is required to comply with the financial assurance provisions of 35 Ill. Adm. Code 725.240(a) (40 CFR 265.140(a)), and 35 Ill. Adm. Code 725.243 (40 CFR 265.143).
3. Respondent had been specifically notified by Certified Letter dated July 22, 1984 of the applicability upon Respondent of the financial assurance responsibility requirements specified at 35 Ill. Adm. Code 725.243 (40 CFR 265.143).
4. Up to and including the date of this Complaint and Findings of Violation, Respondent has refused or failed to comply with the financial assurance requirements of 35 Ill. Adm. Code 725.243 (40 CFR 265.143) and is therefore in violation of Subtitle C of RCRA.

ORDER

IT IS HEREBY ORDERED that Respondent take the following corrective action:

1. Respondent shall, within forty-five (45) days of receipt of this Complaint and Order, provide the Illinois Environmental Protection Agency and the United States Environmental Protection Agency, Region V, with proof of compliance with all financial assurance requirements pursuant to Ill. Adm. Code 725.243 (40 CFR 265.143).
2. Respondent shall provide such proof of financial assurance requirements on forms approved by the Illinois Environmental Protection Agency and which must be accompanied by any other necessary documentation.

3. A civil penalty of \$ is assessed for the violation set forth in Findings above.

Respondent is hereby notified that the above Order shall become final unless Respondent has requested in writing a public hearing on the Order, no later than thirty (30) days from the date this Order is served. Respondent has the right to request a hearing to contest any factual allegation set forth in the Complaint or the appropriateness of the proposed penalty and compliance schedule set forth in the Order. In the event Respondent elects to request a hearing, and to avoid having the hereinabove Compliance Order become final without further proceedings, Respondent must file a written answer of the Complaint with the Regional Hearing Clerk, United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from the date this Complaint and Order is served. A copy of any written answer to the Complaint and any subsequent document filed in this action should also be sent to the Waste Management Division, Attention: Waste Management Branch; Technical, Permits and Compliance Section, at the same address. Such answer must clearly and directly admit, deny or explain.

Request for an informal conference or service of documents should be made
to _____ at the above-named address, telephone
number (312) _____.

Signed this _____ day of _____, 1984

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

BGC:BS:st:sp426d-427d

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Burgess-Norton MFG. Co.
(B) Street: 737 Peyton Street
(C) City: Geneva (D) State: ILL. (E) Zip Code: 60134
(F) Phone: 312/232-4100 (G) County: KANE
(H) Operator: Amsted Ind. Inc.
(I) Street: 3700 Prudential Plaza
(J) City: Chicago (K) State: ILL. (L) Zip Code: 60601
(M) Phone: 312/645-1700 (N) County: COOK
(O) Owner: (Same as above)
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Date of Inspection: 1-19-82 (W) Time of Inspection (From) 9:30 AM (To) 11:30 AM
(X) Weather Conditions: 30°, Sunny

| | | |
|-----------------------------|-----------------|---------------------|
| (Y) Person(s) Interviewed | Title | Telephone |
| <u>Frank Smith</u> | <u>Chemist</u> | <u>312/232-4100</u> |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| (Z) Inspection Participants | Agency/Title | Telephone |
| <u>BRAD Benning</u> | <u>IEPA/EPS</u> | <u>312/345-9780</u> |
| <u>Rick Peterson</u> | <u>" "</u> | <u>" "</u> |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| (AA) Preparer Information | | |
| Name | Agency/Title | Telephone |
| <u>BRAD Benning</u> | <u>IEPA/EPS</u> | <u>312/345-9780</u> |

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><u>X</u> A. Storage and/or Treatment</p> <ol style="list-style-type: none"> 1. Containers (I) ✓ 2. Tanks (J) 3. Surface Impoundments (K) 4. Waste Piles (L) <p>___ B. Land Treatment (M)</p> <p>___ C. Landfills (N)</p> | <p>___ D. Incineration and/or Thermal Treatment (O and P)</p> <p>___ E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Omitted pages 11-18, 21, 23

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

| | Yes | No | NI* | Remark |
|---|-----|----|-----|-------------------------------------|
| (A) Has the Regional Administrator been notified regarding: | | | | |
| 1. Receipt of hazardous waste from a foreign source? | — | ✓ | — | _____ |
| 2. Facility expansion? | — | ✓ | — | _____ |
| (B) General Waste Analysis: | | | | |
| 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | — | ✓ | — | _____ |
| 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? | — | ✓ | — | _____ |
| 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | — | — | ✓ | N/A _____ |
| (C) Security - Do security measures include: (if applicable) | | | | |
| 1. 24-Hour surveillance? | ✓ | — | — | 24-hr. operation _____ |
| 2. Artificial or natural barrier around facility? | ✓ | — | — | Additional Fencing planned _____ |
| 3. Controlled entry? | ✓ | — | — | _____ |
| 4. Danger sign(s) at entrance? | — | ✓ | — | _____ |
| (D) Do Owner or Operator Inspections Include: | | | | |
| 1. Records of malfunctions? | ✓ | — | — | _____ |
| 2. Records of operator error? | ✓ | — | — | _____ |
| 3. Records of discharges? | ✓ | — | — | _____ |

*Not Inspected

| | Yes | No | NI* | Remarks |
|---|-------------------------------------|--------------------------|--------------------------|-----------------------------|
| 4. Inspection schedule? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. Safety, emergency equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>Separate Inspection.</u> |
| 6. Security devices? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>" "</u> |
| 7. Operating and structural devices? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8. Inspection log? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (E) Do personnel training records include: (Effective 5/19/81) | | | | |
| 1. Job titles? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Job descriptions? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. Description of training? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. Records of training? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. Have facility personnel received required training by 5-19-81? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>Current supervision</u> |
| 6. Do new personnel receive required training within six months? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>by plant chemist.</u> |
| (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | | | | |
| 1. Special handling? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>Storage area</u> |
| 2. No smoking signs? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>will be partitioned</u> |
| 3. Separation and protection from ignition sources? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>into three areas</u> |

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ☒ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ — —

heat sensitive alarm

2. Telephone or 2-way radios
at the scene of operations?

☒ — —

Telephones
Coord- 2-way radios

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ — —

Extinguishers
absorbant
Rubber suits, masks

Indicate the volume of water and/or foam available for fire control:

Sprinkler system, City water

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ — —

Semi-Annual

2. Is emergency equipment
maintained in operable
conditions?

☒ — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ — —

(E) Is there adequate aisle space
for unobstructed movement?



V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the
following information:

Yes No NI*

Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)



*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

| | Yes | No | NI* | Remarks |
|--|-------------------------------------|-------------------------------------|-------------------------------------|---|
| (B) Are copies of the Contingency Plan available at site and local emergency organizations? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <u>Copies will be sent to local auth.</u> |
| (C) Emergency Coordinator | | | | |
| 1. Is the facility Emergency Coordinator identified? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Is coordinator familiar with all aspects of site operation and emergency procedures? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (D) Emergency Procedures | | | | |
| If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <u>NO Emergencies</u> |

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

| | Yes | No | NI* | Remarks |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------|
| (A) Use of Manifest System | | | | |
| 1. Does the facility follow the procedures listed in §265.71 for processing each manifest? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <u>NO-HAZ. waste accepted</u> |
| 2. Are records of past shipments retained for 3 years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| (B) Does the owner or operator meet requirements regarding manifest discrepancies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ — — —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓ — — —

- c. The location and quantity of each hazardous waste within the facility?

✓ — — —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — — ✓ n/a

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ — — —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓ — — —

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ — — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE

| Yes | No | NI* | Remarks |
|-----|----|-----|---------|
|-----|----|-----|---------|

(A) Closure and Post Closure

1. Is the facility closure plan available for inspection by May 19, 1981?

2. Has this plan been submitted to the Regional Administrator

3. Has closure begun?

4. Is closure estimate available by May 19, 1981?

(B) Post closure care and use of property

Has the owner or operator supplied
a post closure monitoring plan?
(effective by May 19, 1981)

✓ n/a

VIII. FACILITY STANDARDS

(Part 265, Subparts I thru R)

I USE AND MANAGEMENT OF CONTAINERS

Facility Name: Burgess-Norton

Date of Inspection: 1-19-82

| Yes | No | NI* | Remarks |
|-----|----|-----|---------|
|-----|----|-----|---------|

1. Are containers in good condition?



2. Are containers compatible with waste in them?

3. Are containers stored closed?

4. Are containers managed to prevent leaks?

✓

5. Are containers inspected weekly for leaks and defects?

✓

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)

| | Yes | No | NI* | Remarks |
|---|-------------------------------------|--------------------------|--------------------------|---------|
| 7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | barrier |

J
TANKS

Facility Name: _____ Date of Inspection: _____

| | | | | |
|--|--|--|--|--|
| 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? | | | | |
| 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? | | | | |
| 3. Do continuous feed systems have a waste-feed cutoff? | | | | |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? | | | | |
| 5. Are required daily and weekly inspections done? | | | | |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | | | | |
| 7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) | | | | |

| | Yes | No | NI* | Remarks |
|--|-------|-------|-------|---------|
| 3. Has the owner or operator addressed the waste analysis requirements of 265.402? | _____ | _____ | _____ | _____ |
| 4. Are inspection procedures followed according to 265.403? | _____ | _____ | _____ | _____ |
| 5. Are the special requirements fulfilled for ignitable or reactive wastes? | _____ | _____ | _____ | _____ |
| 6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) | _____ | _____ | _____ | _____ |

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

| | Yes | No | NI* | Remarks |
|---|---------|-------|-------|---------|
| (A) Does the operator have copies of the manifest available for review? | ✓ _____ | _____ | _____ | _____ |
| (B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements) | | | | |
| 1. Manifest document number? | ✓ _____ | _____ | _____ | _____ |
| 2. Name, mailing address, telephone number, and EPA ID Number of Generator | ✓ _____ | _____ | _____ | _____ |

| | Yes | No | NI* | Remarks |
|--|-------------------------------------|--------------------------|--------------------------|---------|
| 3. Name and EPA ID Number of Transporter(s)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. The total quantity of waste(s) and the type and number of containers loaded? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 7. Required certification? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8. Required signatures? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (C) Does the owner or operator submit exception reports when needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

2. PRE-TRANSPORT REQUIREMENTS

| | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--|
| (A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (C) If required, are placards available to transporters of hazardous waste? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

| | Yes | No | NI* | Remarks |
|--|-------------------------------------|--------------------------|-------------------------------------|-----------------------|
| (A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| (B) Has the generator submitted Annual Reports and Exception Reports as required? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <u>NONE REQUIRED.</u> |

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

| | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--|
| Has the installation imported or exported Hazardous Waste? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
|--|--------------------------|-------------------------------------|--------------------------|--|

(If answered Yes, complete the following as applicable.)

| | | | | |
|--|--------------------------|--------------------------|--------------------------|--|
| 1. Exporting Hazardous waste, has a generator: | | | | |
| a. Notified the Administrator in writing? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c. Met the Manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. Importing Hazardous Waste, has the generator: | | | | |
| Met the manifest requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Burgess-Norton manufactures engine parts, primarily piston pins. They generate three (3) hazardous waste streams, 1) 1-1-1 Trichloroethane ^{FO01} used in degreasing of tools and parts, 2) Quenching waste/water sludge (no cyanides) with a pH in excess of 13.0 (D002). 3) Zinc Phosphate Sludge with pH below 2.0 (D002). The trichloro. waste is reclaimed by McKesson Chemical or Baron Blakeslee, and the sludge material is

REMARKS: Landfilled currently by U.S. Ecology. The trichloro is presently stored inside the plant, and the sludge material is stored outside, all waste is stored in 55gal drums. Future plans are for all haz. waste to be stored outside on a sheltered storage pad, enclosed by a cyclone fence. Wastes FO10 and FO12 are being delisted as no cyanides are used in the heat treating process, but FO12 will be reclassified as D002 due to a high pH. D000 was listed due to high zinc levels, this is also being dropped as USEPA does not consider zinc hazardous. Under the Interim Status Requirements the facility lacked the following: 1) Danger Signs at the Storage Area, 2) Copies of the Contingency Plan had not been sent to local authorities, 3) A Closure Plan had not been prepared.

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Mr. Smith would begin completing the remaining areas where they were in violation. All other required ISS standards were being complied with. Burgess-Norton is complying with Chap. 9 Regulations under Illinois Law for transportation and disposal of their waste material.

REMARKS:

RCRA ENFORCEMENT ACTION SIGN-OFF

PART I. BACKGROUND

FACILITY NAME Burgess - Norton Mfg.
 FACILITY LOCATION General ILL
 RCRA ID NUMBER 1LD 062 406 038
 NATURE OF VIOLATION FINANCIAL

PART II. RECOMMENDATION

Issue the Order

NAME & DATE OF STATE CONTACT NOTIFIED

State Referral

ANY OTHER OUTSTANDING ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER- _____

AIR _____

OTHER _____

PART III. CONCURRENCES

| | INITIALS | DATE | AGREE | DISAGREE |
|---------------------------------------|-----------|--------|-------|----------|
| PREPARER TECHNICAL | W PEARSON | 5/3 | (up) | () |
| LEGAL | P TARBERT | () | () | () |
| CHIEF, STATE TECHNICAL UNIT | BLW | 5/3/84 | (X) | () |
| CHIEF, TP&C SECTION | WJH | 5/4/84 | (X) | () |
| Acting CHIEF, WASTE MANAGEMENT BRANCH | WJH | 5/4/84 | (X) | () |

PART IV. APPROVAL

DIRECTOR, WASTE MANAGEMENT DIVISION

APPROVES (X) DISAPPROVES ()

cc: Section Inspection Log
 ORC

Don't
 only

OFFICE OF REGIONAL COUNSEL
FINAL RCRA ADMINISTRATIVE ORDER
REVIEW AND SIGN-OFF

FACILITY NAME: Burgess - Norton Mfg
LOCATION: Geneva, IL

| | <u>Concur</u> | <u>Non-Concur</u> |
|---------------------------------------|------------------|-------------------|
| STAFF ATTORNEY (<u>TALBERT 5/9</u>) | <u>✓</u> | <u> </u> |
| SENIOR ATTORNEY RCRA <u>5/9</u> | <u>✓</u> | <u> </u> |
| BRANCH CHIEF, SWERB | <u>M659</u> | <u> </u> |
| DEPUTY REGIONAL COUNSEL | <u>DMS/14/84</u> | <u> </u> |
| REGIONAL COUNSEL | <u>DS/14</u> | <u> </u> |

LOGGED INTO ORC BY CHERYL KLEBENOW ON 5/7 ck .
LOGGED OUT OF ORC BY CHERYL KLEBENOW ON 5/14 .
DUE TO WMB ON .



217/782-5544

March 5, 1984

Mr. Basil G. Constantelos, Director
Waste Management Division
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60606

Re: Request for Compliance Order
Burgess-Norton Manufacturing Company
Geneva, Illinois
EPA File #7069-HAZ

Dear Mr. Constantelos:

This Agency hereby requests that a Compliance Order be issued to the above-referenced facility for violations of the RCRA financial assurance regulations. Specific violations of the State of Illinois RCRA regulations (and Federal regulations) pertaining to financial assurance are set forth in the attached draft Complaint.

This Agency has searched its records and finds that the appropriate financial assurance documents have not been filed with the IEPA.

The USEPA supplied the IEPA with a list of those facilities which are required to file financial assurance responsibility documents. Working from the list supplied by USEPA, this Agency has determined that there has been a complete failure to comply with the applicable regulations by the above subject facility.

Please note that the attached draft Compliance Order contains certain blanks so that information can be inserted by the USEPA. Specifically, the amount of civil penalty requested should be inserted by USEPA. However, please note that this Agency recommends a minimum penalty of \$25,000. Also, the USEPA should fill out the name of the employee at the USEPA that should be contacted by the Respondent if Respondent elects to request an informational conference. That person's telephone number should also be included in the Compliance Order.

The IEPA staff attorney assigned to this matter is Mr. Don Gimbel. Mr. Gimbel's address is: Illinois Environmental Protection Agency, Division of Land Pollution Control, 1701 First Avenue, Maywood, Illinois 60153, telephone 312/345-9780. This Agency requests that you or your designee

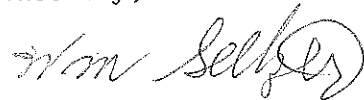
March 5, 1984

advise Mr. Gimbel as to whether or not the USEPA elects to proceed with a Compliance Order in accordance with the request herein. Also, please have Mr. Gimbel advised of the name of the USEPA attorney assigned to this matter so that our respective legal staffs can keep one another informed as to the progress of the Compliance Order. In order for Mr. Gimbel to properly maintain Agency records, it is important that he receive the following: A copy of the actual Compliance Order submitted, the date upon which the Compliance Order is transmitted to Respondent, copies of written answers or other documents filed by Respondent, and information concerning the final resolution.

All relevant attachments are included with this original communication. I trust you will forward the relevant attachments to the USEPA assigned attorney.

Thank you in advance for your assistance.

Sincerely,



William Seltzer
Senior Technical Advisor

Attachments

WS:bkm

cc: Bill Miner, USEPA
Mary Gade, USEPA
Bill Radlinski
Don Gimbel

To CSS file



BURGESS-NORTON MFG. CO.

737 PEYTON STREET • GENEVA, ILLINOIS 60134
GENEVA (312) 232-4100 • CHICAGO (312) 378-4636 • TELEX 720-449

February 15, 1982

Mr. Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, IL 60153

RECEIVED

FEB 18 1982

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Dear Mr. Bechely,

Your correspondence dated 2/5/82, with respect to the RCRA inspection, 1/19/82, of Burgess-Norton Mfg. Co. - U.S. EPA I.D. #ILD062406038 was received by the writer, 2/12/82.

Based on said inspection the following areas of non-compliance were noted:

- Item #1 - 40 CFR 265.53(b) - copies of the Burgess-Norton Mfg. Co., Plant #1, contingency plan were not submitted to local emergency response organizations.
- Item #2 - 40 CFR 265.112 - no closure plan was present at the time of the inspection.
- Item #3 - 40 CFR 265.14(c) - no "Danger-Unauthorized Personnel Keep Out" signs had been posted at each entrance to the active portion of the facility and at other locations which can be seen from any approach to the active portion.

The following steps taken to correct the above deficiencies are addressed on an item by item basis:

- Item #1 - Copies of the Burgess-Norton Mfg. Co., Plant #1, contingency plan have been filed with the following local emergency response organizations:

Geneva Community Hospital
Geneva Fire Department
Fox-Valley Family Physicians
Geneva Police Department

ONE OF THE **Amstec**
INDUSTRIES

2/15/82

- Item #2 - A closure plan has been incorporated into our Policies and Procedures - Hazardous Wastes, copy attached.
- Item #3 - "Danger-Unauthorized Personnel Keep Out" warning signs have been posted at each entrance to the active portion of the facility and at other locations which can be seen from any approach to the active portion.

If you have any further questions concerning these matters, please do not hesitate to contact the writer.

Sincerely,

Frank J. Smith

Frank J. Smith
Technical Advisor for
Environmental Affairs

cc: R. A. Bagby (Attachment: cover letter, closure plan)
E. C. Hazlewood (Attachment: cover letter, closure plan)
J. E. Williams (Attachment: cover letter, closure plan)
G. W. Swinderman (Attachment: cover letter, closure plan)
E. Brosius - Amsted Legal (Attachment: cover letter, inspection report)
File - U.S. EPA Inspections " " "closure plan)
S. E. Kelm (Attachment: cover letter, inspection report, closure plan)

FJS:dm

Amendment to Policies & Procedures Covering Hazardous Wastes
Section VI - Operating Record

Facility Closure

I. Should Burgess-Norton Mfg. Co., terminate its manufacturing operations in its facility known as Plant #1, Geneva, Illinois, the following closure conditions with respect to hazardous waste are envisioned.

A. At time of closure the following hazardous wastes may be present.

1. Waste stream #1 (waste chlorinated solvents) in drum storage.
2. Waste stream #2 (caustic quench sludge) in drum storage and/or in the various caustic quench processing tanks.
3. Waste stream #3 (waste zinc phosphate sludge) in drum storage and/or in the zinc phosphate coating tanks.

II. Closure Performance Standard

A. Burgess-Norton Mfg. Co., Plant #1, will be closed in a manner which:

1. Minimizes the need for further maintenance.
2. Controls, minimizes, or eliminates, to the fullest extent possible threats to human health and the environment, post-closure escape of hazardous wastes, leachate, or waste decomposition products to the ground or surface waters or to the atmosphere.

III. Time Allowed for Closure

A. Within 90 days after generating the final volume of hazardous wastes, Burgess-Norton would plan to remove from the site all hazardous wastes in accordance with the closure plan.

IV. Disposal or decontamination of equipment

A. When closure is completed, all facility equipment and structures will have been disposed of, or decontaminated by removing all known hazardous waste and residues.

V. Certification of Closure

A. When closure is completed, Burgess-Norton will submit to the Regional Administrator certification of its own as well as

V. (continued)

- A. ... by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

VI. Closure

- A. At closure, all known hazardous waste and hazardous waste residues will be removed from the containment system. Remaining containers, liners, bases and soil containing or contaminated with known hazardous waste or hazardous waste residues will be decontaminated or removed. Estimated cost, 10 man hours at \$18.09/hr. = \$181.00.
- B. At closure, all known hazardous waste and hazardous waste residues will be removed from tanks and discharge confinement structures. For estimated cost refer to VIII.

VII. Estimated Hazardous Waste Inventory

- A. Waste stream #1
1. 20 drums
- B. Waste stream #2
1. 20 drums, plus residual waste in the caustic quench processing tanks (estimated 20 drums total)
- C. Waste stream #3
1. 100 drums, plus residual waste in the zinc phosphate coating tanks (estimated 2 drums total).

VIII. Steps Needed to Decontaminate Facility Equipment During Closure

- A. Waste stream #1
1. All full drums of waste 1,1,1 trichloroethane are to be sealed and labeled.
 2. All partially full drums of waste 1,1,1 trichloroethane are to be collected and consolidated into full drums, sealed and labeled.
 - a. Estimated cost
 1. 20 man-hours at \$18.09/hr. = \$361.80
 2. Reclaim credit of \$.85/gal. - 1100 gal. = \$935.00

VIII. (continued)

B. Waste stream #2

1. All full drums of caustic sludge are to be sealed and labeled.
2. All processing tanks are to be completely cleaned out, with waste collected in 55 gal. drums. Drums are to be sealed and labeled.
3. All contaminated equipment and clothing is to be rinsed clean at a convenient area whose discharge drains to the sanitary sewer.
 - a. Estimated cost
 1. 6 processing tanks at 10 man-hours each,
 $6 \times 10 \times \$18.09 = \$1,085.40$.
 2. Estimated 40 drums at landfill charge of
 $\$60.00/\text{drum} = \$2,400.00$.
 3. Clean-up of equipment, 40 man-hours at $\$18.09/\text{hour} = \723.60 .

C. Waste stream #3

1. All full drums of waste zinc phosphate sludge are to be sealed and labeled.
2. All processing tanks are to be cleaned out, with waste collected in 55 gal. drums. Drums are to be sealed and labeled.
3. All equipment and clothing is to be rinsed clean at a convenient area whose discharge drains to the sanitary sewer.
 - a. Estimated cost
 1. 2 processing tanks at 10 man-hours each,
 $2 \times 10 \times \$18.09 = \361.80 .
 2. Estimated 100 drums at landfill charge of
 $\$60.00/\text{drum} = \$6,000.00$.
 3. Clean-up equipment, 20 man-hours at $\$18.09/\text{hr.} = \361.80 .

Estimated closure cost (sum of VIA + VIIIA al + 2 + VIIIB al + 2 + 3 + VIIC al + 2 + 3) is \$11,475.40, plus registered professional consultant, 5 days at

\$500.00/day = \$2,500.00 gives a total closure cost of
approximately \$14,000.00



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

312/345-9780
1701 First Avenue
Maywood, Illinois 60153

Refer to: Kane County - 08903508 - Geneva/Burgess-Norton

February 5, 1982

Burgess-Norton Co.
737 Peyton Street
Geneva, Illinois 60134

Attention: Frank Smith

Dear Mr. Smith:

On January 19, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of the Burgess-Norton Mfg. Co. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Requirements contained in 40 CFR 265.53(b) were not complied with in that copies of the contingency plan were not submitted to local emergency response organizations.

The owner/operator must have a closure plan at the facility. The plan must include a description of how and when the facility will be partially closed, if applicable, and ultimately closed. The plan must address the steps needed to decontaminate facility equipment. Also required is an estimate of the maximum inventory of wastes in storage or treatment on site at any given time and a schedule for final closure including the anticipated date when wastes will no longer be required. The owner/operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. These requirements are pursuant to 40 CFR 265.112. Your facility is deficient in that no such plan was present at the time of the inspection.

Pursuant to 40 CFR 265.14(c), the owner/operator must post a sign with the legend, "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion. At the time of the inspection, no such "Danger" signs had been posted as required by 40 CFR 265.14(c).

L P C F C O 5 5 C
(1) (8) (9)

INSPECTION REPORT - SITE INVENTORY NO. 08901508

(11)

(18)

CO. - L.P.C.

Region #

Date 2/1/82

(20) (25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No (X) Time: From 09:30 a.m.

Ground Water() Surface() Other() To 11:30 a.m.

Photos Taken: Yes () No (X) Interviewed

Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage (X)

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) (X)

(31)

IMPROVED

SAME

DETERIORATED

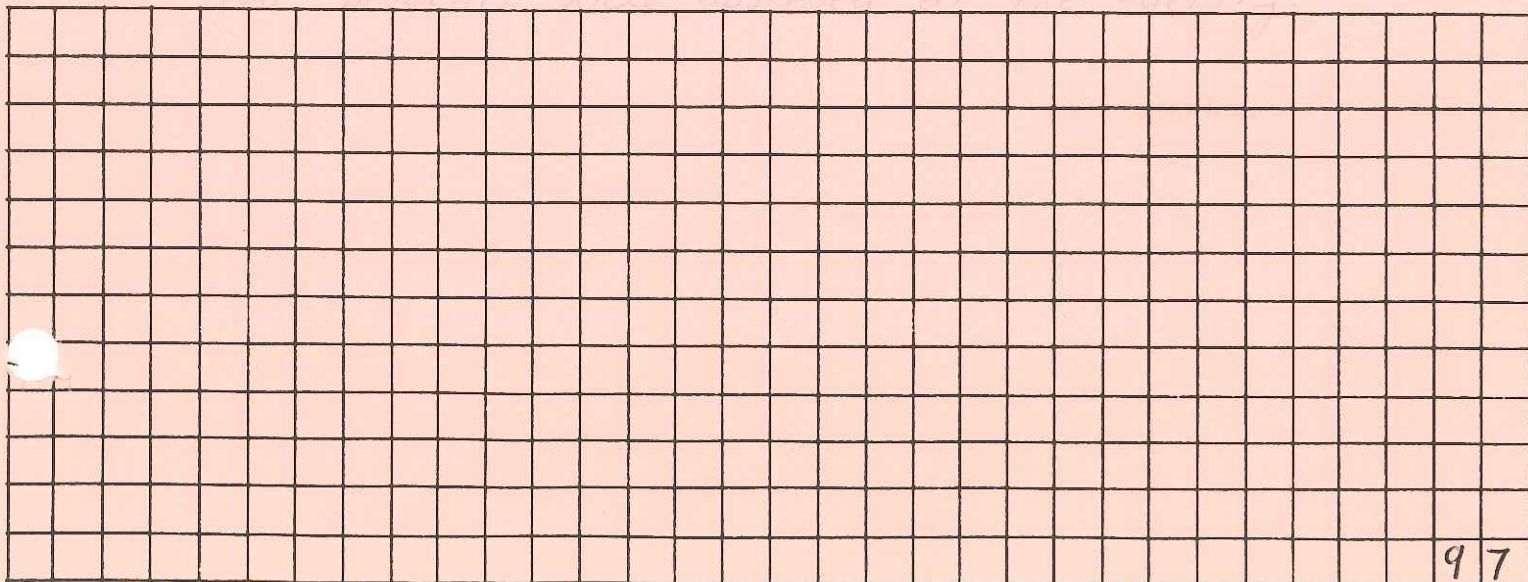
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



**D. Corrective
Action**

YE

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski

Date: September 23, 1992

EMPLOYEE
CONFIDENTIAL

Background Facility Information

Facility Name: Burgess-Norton Manufacturing Company Plant 1

EPA Identification No.: ILD 062 406 038

Location (City, State): Geneva, Illinois

Facility Priority Rank: Low

RELEASED
DATE 5/5/99
RIN #
INITIALS mv

RECEIVED
OCT 13 1992

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility

5 SWMUs

1 AOC

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☐ Other (Explain)

There is no evidence of past corrective actions.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)
☒ RCRA Facility Assessment (RFA) or equivalent completed
☐ RCRA Facility Investigation (RFI) underway
☐ RFI completed
☐ Corrective Measures Study (CMS) completed
☐ Corrective Measures Implementation (CMI) begun or completed
☐ Interim Measures begun or completed

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☐ No
☐ Uncertain; still underway
☒ Not required

Additional explanatory notes:

Interim measures have not been formally required. However, the facility is in the process of planning remediation of a release to on-site soil. The remediation is being conducted voluntarily.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

☒ Ground water
☐ Surface water
☐ Air
☒ Soils

6. Are contaminant releases migrating off-site?

☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

☐ No
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

☐ Yes (Go to 8a)
☐ No
☒ Uncertain

Additional explanatory notes:

It is not known if contaminants are migrating off-site.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Ground water is used as a source of drinking water but the distance to nearby wells is not known.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

☐ Yes (Go to 9)
☐ No
☒ Uncertain

Additional explanatory notes:

It is not known if contaminants are migrating off-site.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

There is a wetland and a river within 1/2 mile of the facility but surface and ground-water flow directions are not known.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

The facility is in the process of planning remediation but no further information is available.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

The facility is in the process of planning remediation but no further information is available.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

The facility is in the process of planning remediation but no further information is available.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid
☒ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☐ Dissolved in ground water or surface water
☐ Gaseous
☐ Other _____

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☒ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

The facility is planning remediation but details on the type of remediation planned was not available.

() No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

() Yes
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

(X) Yes
() No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

() Yes
() No
(X) Uncertain

Additional explanatory notes:

The facility is planning remediation but details on the type of remediation planned was not available.

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes
() No
() Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ (X) Yes
- ☐ () No, not feasible
- ☐ () No, not required
- ☐ () Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a 7/14/92 PA/VSI report by PRC.

The facility observed a release to on-site soil in an area which formerly housed fuel oil and gasoline USTs. The facility hired a consultant who conducted soil sampling and installed monitoring wells. The facility is planning remediation but information on the type of remediation planned was not available.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 26 1993

Mr. Frank Smith
Burgess Norton Mfg., Co.
737 Peyton Street
Geneva, Illinois 60134-2189

HRE-8J

RE: Amstead Industries Inc.
ILD 062 406 038

Dear Mr. Smith:

Enclosed, please find a revised Preliminary Assessment/Visual Site Inspection (PA/VSI) for the referenced facility. This report was revised in response to comments provided in your June 22, 1993, letter.

I would like to point out that many of your comments concerning the underground storage tanks are a direct result of facility representatives refusal to provide this information during the VSI. This apparently was caused by a misunderstanding regarding the scope of the United States Environmental Protection Agency's (U.S. EPA) legal authority concerning such assessments. Other comments contradict information which was provided by facility personnel during the VSI.

Nevertheless the report has been revised to address your concerns. We hope that we can rely on your future cooperation pertaining to environmental matters.

If you have any questions please call me at (312) 866-4448.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin M. Pierard".

Kevin M. Pierard, Chief
MN/OH Technical Enforcement Section

Enclosure



Printed on Recycled Paper

AUG 26 1993

Mr. Frank Smith
Burgess Norton Mfg., Co.
737 Peyton Street
Geneva, Illinois 60134-2189

HRE-8J

RE: Amstead Industries Inc.
ILD 062 406 038

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Nevertheless the report has been revised to address your concerns. We hope that we can rely on your future cooperation pertaining to environmental matters.

If you have any questions please call me at (312) 866-4448.

Sincerely,


ORIGINAL SIGNED BY
KEVIN M. PIERARD

Kevin M. Pierard, Chief
MN/OH Technical Enforcement Section

Enclosure
HRE-8J:KPIERARD:ab:08/02/93:6-4448:#2

pavsi\smith.1tr

OFFICIAL FILE COPY

| CONCURRENCE REQUESTED FROM REB | | | |
|--------------------------------|--------------|--|------------------------|
| OTHER STAFF | REB STAFF | REB SECTION CHIEF | REB BRANCH CHIEF |
| | |  8-2 | |



BURGESS-NORTON MFG., CO.

RECEIVED

JUN 25 1993

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

Certified Mail
Return Receipt Requested

June 23, 1993

**RECEIVED OCT 01 1993
WMD RCRA
RECORD CENTER**

Mr. Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: AMSTED Industries Incorporated
Burgess-Norton Mfg. Co. Plant #1
Geneva, Illinois
USEPA I.D.#ILD062406038
Visual Site Inspection
Final Report

Dear Mr. Pierard,

Per the request procedure as outlined under 5 USC 552 this correspondence is submitted as a written request under the Freedom of Information Act statute guidelines regarding the subject report and specifically to request a copy of the entire report including the Executive Summary and conclusions/recommendations section(s).

Any questions concerning this correspondence should be addressed to the undersigned.

Sincerely,

Burgess-Norton Mfg. Co.
Manager
Environmental Engineering

cc: B-N
SMB
SEK
MHO
JPM
File: Environmental Engineering

AMSTED

EJB

MDB

737 Peyton Street Geneva, IL 60134-2189

[708] 232-4100

FAX [708] 232-3634

ONE OF THE **Amsted**
INDUSTRIES



BURGESS-NORTON MFG., CO.

RECEIVED

JUN 25 1993

**OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V**

Certified Mail
Return Receipt Requested

June 22, 1993

**RECEIVED OCT 01 1993
WMD RCRA
RECORD CENTER**

Mr. Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: AMSTED Industries Incorporated
Burgess-Norton Mfg. Co. Plant #1
Geneva, Illinois
USEPA I.D.#ILD062406038
Visual Site Inspection
Final Report

Dear Mr. Pierard,

I am in receipt of the 4/21/93 correspondence from your office regarding the subject final report. In reviewing same, a number of what I believe to be errors in the PRC/RAI report need to be corrected. This correspondence is submitted in an effort to address these issues.

1. Page #4, Section 2.2, paragraph #1

Zinc phosphating of piston pins is performed prior to, not after, the heat treating process.

2. Page #6, Section 2.2, paragraph #4

Of the 14 previous USTs at the site, only one UST release was reported to the Illinois Emergency Management Agency. Refer to attachment #1, a copy of Illinois ESDA field report regarding this release. I have no explanation, nor to the best of my knowledge, is there any basis for the PRC/RAI statement that "Three of the USTs are reported to have leaked."

AMSTED Industries Incorporated
Burgess-Norton Mfg. Co. Plant #1
Geneva, Illinois
USEPA I.D.#ILD062406038
Visual Site Inspection
Final Report

3. Page #7, Section 2.3, paragraph #2

Waste quench oil and sludge is now, and has been for approximately the last five (5) years, pumped from the process tanks and hauled off-site for recycling by Beaver Oil & Sludge, Hodgkins, Illinois. Refinery Products Company, Schiller Park, Illinois, has not been used as either a transporter or off-site TSD since 1987 by BN Plant #1.

4. Page #12, Section 2.3, paragraph #4

The wastewater effluent discharge from the BN Plant #1 WWTs (SWMU 4) does not now, nor has it ever been, discharged to the Fox River under NPDES Permit #IL0036331. This WWTs effluent discharge is now, and has always, discharged to the City of Geneva POTW under City of Geneva General Wastewater Discharge Permit #1992-IPP-17-BN. Refer to attachment #2, a copy of this permit.

5. Page #12, Section 2.4, paragraph #2

As can be seen from Illinois ESDA field report (attachment #1), the UST release was reported on 9/20/89 and given incident #891840. The reporting date of 11/8/89 and incident #892276 in the PRC/RAI report are incorrect.

6. Page #13, Section 2.5, paragraph #1

The original RCRA Closure Plan for the subject facility was properly submitted to, received by, and is available from the IEPA. I have no explanation for, nor to the best of my knowledge, is there any basis for the PRC/RAI statement that "Copies of the closure plan were not available from IEPA."

7. Page #14, Section 2.5, paragraph #4

Both of the storm sewer (NPDES) outfalls are for storm water run-off and non-contact cooling water only. Neither of these outfalls receives, or discharges, any effluent from the WWTs (SWMU 4).

8. Page #14, Section 2.5, paragraph #6

Refer to point #2, page #1 of this correspondence.

AMSTED Industries Incorporated
Burgess-Norton Mfg. Co. Plant #1
Geneva, Illinois
USEPA I.D.#ILD062406038
Visual Site Inspection
Final Report

9. Page #17, Section 2.6.4, paragraph #3

The City of Geneva does not obtain their drinking water supply from the Fox River.

10. Page #21, SWMU 4, Unit Description, last sentence

Refer to point #4, page #2 of this correspondence.

It is my understanding from Ms. Francene Harris of your staff, based on my phone discussion with her of 6/3/93, that the executive summary and conclusions and recommendations sections of the PRC/RAI report which have been withheld from the BN copy of the subject report are not available to BN, even with a Freedom of Information Act (FIA) request. I respectfully request that this decision be reviewed and reversed and that these portions of the PRC/RAI final report be made available to BN at your earliest convenience.

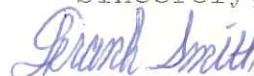
Please be advised that a Freedom of Information Act request regarding the above referenced report sections is in process of being filed separately.

Further, I wish to remind you of the 4/29/92 correspondence from Mr. E.J. Brosius, AMSTED Law Department, regarding the Visual Inspection and the question/issue of statutory authority for corrective action at the subject facility.

Finally, due to the numerous reporting errors and misleading statements by PRC/RAI in the compilation and dissemination of the information contained in the subject PA/VSI report, I respectfully request that a corrected report, which includes the comments contained herein, be prepared and issued, with a copy routed to the undersigned.

Any questions concerning this correspondence should be addressed to the undersigned.

Sincerely,



Burgess-Norton Mfg. Co.
Manager
Environmental Engineering

cc: B-N
SMB
SEK
MHO
JPM
File: Environmental Engineering

AMSTED
EJB
MDB

PA/VSJ Release Approval Form

Site Name: Burgess-Norton MFJ

Site ID #: ILD 062 406 038

FOIA RIN No. RIN 00358-06

Program Contact Name & Number:

Sharon TRAVIS - 6-6533
DM-7J

Release: X

Partial Release: _____

Do Not Release: _____

Attorney's Name: Mark Palermo

Attorney's Signature: [Signature]

Date of Signature: 1/11/06

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**BURGESS-NORTON MANUFACTURING COMPANY,
PLANT 1
GENEVA, ILLINOIS
ILD 062 406 038**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

| | | |
|-----------------------------|---|--|
| Work Assignment No. | : | C05087 |
| EPA Region | : | 5 |
| Site No. | : | ILD 062 406 038 |
| Date Prepared | : | March 12, 1993 |
| Contract No. | : | 68-W9-0006 |
| PRC No. | : | 009-C05087-IL4K |
| Prepared by | : | Resource Applications, Inc. (William Earle) |
| Contractor Project Manager | : | Shin Ahn |
| Telephone No. | : | (312) 856-8700 |
| EPA Work Assignment Manager | : | Kevin Pierard |
| Telephone No. | : | (312) 886-4448 |

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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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RELEASED
DATE 5/5/99
RIN #
INITIALS CW

ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Burgess-Norton Manufacturing Company, Plant 1 (Burgess-Norton) facility in Geneva, IL. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Burgess-Norton Facility manufactures piston pins. The manufacture of piston pins generates zinc phosphate sludge, waste caustic quench sludge, and waste oil. The associated quality control laboratory generates spent Freon and spent methanol. The facility has operated at its current location since 1903. The facility occupies 7.3 acres in a residential area and employs about 225 people. The facility is operating as a small-quantity generator. In the past, Burgess-Norton had two RCRA container storage areas, both of which were RCRA closed in 1988. The Part A permit application listed two tank storage units; this was done in error and referred to two process units, which generate, but do not manage waste. The facility's Part A permit application was withdrawn in 1988.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Former Outdoor Storage Area
2. Former Indoor Storage Area
3. Zinc Phosphating Fume Scrubber
4. Wastewater Treatment System
5. Laboratory Waste Satellite Accumulation Area

Area of Concern

1. Former Underground Storage Tank Areas

RELEASED
DATE 3/5/99
RIN #
INITIALS MV

ENFORCEMENT
CONFIDENTIAL

The potential for release to ground water from all SWMUs is low because they are either closed or located inside. The AOC has a documented release and therefore the potential for ground water contamination must be considered high. Remediation is planned for the AOC.

The potential for unpermitted release to surface water for the SWMUs and AOC is low. The Wastewater Treatment System, SWMU 4, discharges under NPDES permit No. IL0036331 to the Fox River. The Wastewater Treatment System (SWMU 4) has the capability of holding up to two days' discharge if necessary.

The facility reports that it maintains a facility wide air emissions permit. The potential for unpermitted release is low for all SWMUs except SWMU 5, as most of the wastes generated are liquids with low volatility, sludges, or solids. SWMU 5 has a solvent odor around it, and therefore has a moderate potential for release to outside air.

The potential for release to on-site soils is low for all SWMUs. A release to the soil has occurred from AOC 1. The facility is aware of this and is planning to remediate.

RAI recommends that the AOC be remediated per IEPA guidelines and that SWMU 5 be better managed to minimize the potential for air releases. Once the AOC has been remediated, no further action will be necessary for this facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Burgess-Norton Manufacturing Company, Plant 1 (Burgess-Norton) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Burgess-Norton facility (EPA Identification No. ILD 062 406 038) in Geneva, Illinois. The PA was completed on April 29, 1992. RAI gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional information pertaining to the facility and surrounding area was obtained from publications from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS) and the U.S. Department of the Interior (USDI). The VSI was conducted on April 30, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified five SWMUs and one AOC at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and six inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors.

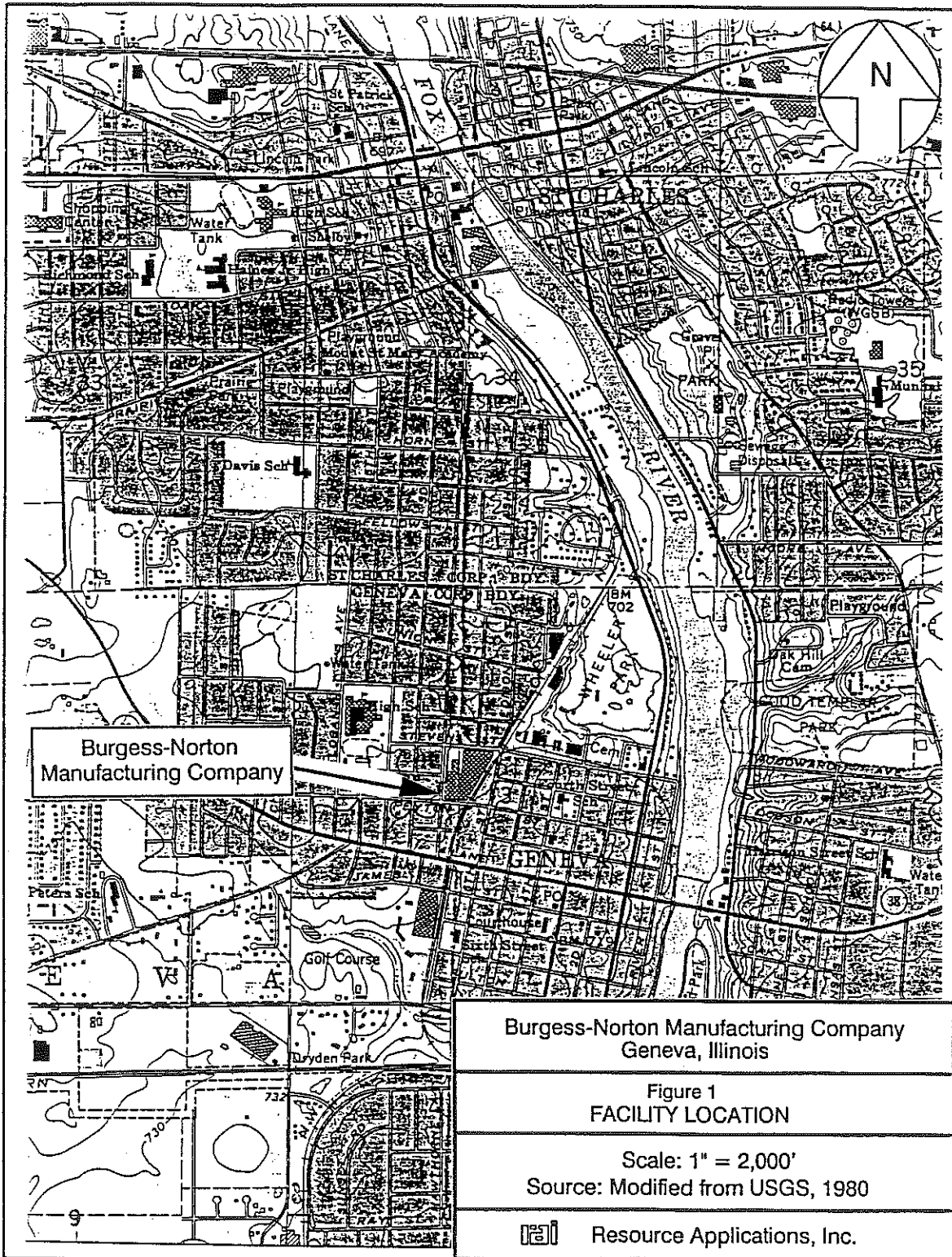
2.1 FACILITY LOCATION

The Burgess-Norton facility is located at 737 Peyton Street in Geneva, Kane County, Illinois (latitude 41°54'52' N and longitude 88°14'48' W). Figure 1 shows the location of the facility in relation to the surrounding topographic features. The facility occupies 7.3 acres in a residential area.

The Burgess-Norton facility is bordered on the north by an employee parking lot and residences; on the west by Richards Street and residences; on the south by Peyton Street, Burgess-Norton general offices, parking lot, and residences; and on the east by an abandoned railroad right-of-way, parking lot, and residences.

2.2 FACILITY OPERATIONS

The Burgess-Norton facility manufactures piston pins. The piston pins are made from steel bars or coil steel. The manufacturing process is primarily mechanical. The steel is cut, machined, ground, and drilled as necessary. Zinc phosphate is used as a carrier for sodium stearate lubricant for these processes in a closed loop system. The piston pins are then heat treated and quenched in either oil or caustic quench as required. Some of the piston pins are then phosphate-coated, using an acid bath zinc phosphating procedure. Final machining is then done, followed by packaging and shipment. Steel coil and bars are stored north of the facility in a warehouse until needed. The finished product is typically stored at the facility prior to shipment. The facility generates used lead-acid batteries from its lift vehicles for recycling. Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.



The facility has operated at its current location since 1903 and employs about 225 people in three shifts, with most employees working the first shift. The facility is located on approximately 7.3 acres and has approximately 200,000 square feet of floor space in one main building. Two additional buildings, located on the north side of Stevens Street, are used to store incoming steel. The area is currently a residential area, however the facility predates most of the residences.

The phosphate and sludge quench tanks are part of the manufacturing processes and are emptied as necessary. The zinc phosphate and caustic quench sludge are emptied into the wastewater treatment system; the waste quench oil and sludge is pumped directly from process to tank trucks for transportation to a reclaiming facility. In the past, the zinc phosphate sludge and caustic quench sludge were managed in 55- or 85-gallon drums and stored in the Former Outdoor Storage Area (SWMU 1) prior to disposal off site. Zinc phosphate fumes from the zinc phosphating process are run through the Zinc Phosphating Fume Scrubber (SWMU 3) prior to discharge. Wastewater from the Zinc Phosphating Fume Scrubber (SWMU 3), along with other industrial wastewater, is treated by the Wastewater Treatment System (SWMU 4), prior to discharge. The scrap steel is recycled off site. The Laboratory Waste Satellite Accumulation Area (SWMU 5) accumulates spent methanol and spent Freon from the quality control laboratory. In the past, these wastes, along with spent 1,1,1-trichloroethane used in degreasing, were stored at the Former Indoor Storage Area (SWMU 2) prior to disposal off site.

The facility had 14 Underground Storage Tanks (USTs) (AOC 1) at one time. These USTs were used to store heating oil and gasoline for use at the facility. Three of the USTs are reported to have leaked. The size of the release is unknown. For more information see Section 2.4.

The facility has been owned and operated by Burgess-Norton Manufacturing Company since operations began. Burgess-Norton has been a division of Amsted Industries since 1965.

2.3 WASTE GENERATION AND MANAGEMENT

The special and hazardous waste streams presently generated at the Burgess-Norton facility are waste quench oil and sludge, caustic quench sludge, zinc phosphate sludge, wastewater, spent Freon, spent methanol, waste oil, and mixed waste from various sources. In the past, the facility has

generated spent 1,1,1-trichloroethane from a degreasing process no longer used. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOC is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Piston pin production consists of machining steel and heat treating and/or phosphating depending on the metallurgical requirements. Presently, the process generates no hazardous waste. Waste quench oil and sludge from the oil quench tanks is pumped from process tanks to trucks to be recycled off-site by Refinery Products Company of Schiller Park, Illinois. Approximately 250 gallons of waste quench oil and sludge are removed from the process tanks every 2 to 3 years.

The zinc phosphate sludge, Zinc Phosphating Fume Scrubber (SWMU 3) wastewater and caustic quench sludge are pumped from process equipment through pipes and treated with the facility's process wastewater in the Wastewater Treatment System (SWMU 4). Annually, approximately 275 cubic yards of a mixed waste (all nonhazardous) are generated primarily from housekeeping procedures, furnace soot, and waste soap and sludge from water washing operations. This waste is managed on site in a dumpster before being transported by Fox Valley Disposal as a special waste to Settlers Hill Landfill and Recycling in Batavia, Illinois or Woodland Landfill and Recycling in South Elgin, Illinois for disposal. After accumulation in the Laboratory Waste Satellite Accumulation Area (SWMU 5), spent Freon and spent methanol from the quality control laboratory are picked up by a licensed waste handler for off-site disposal at a licensed facility. In the past, these wastes have been transported and disposed of by Baron Blakeslee of Cicero, Illinois.

The Wastewater Treatment System (SWMU 4) generates several waste streams. Waste oil and waste coolant generated from the oil/water separator are accumulated and dewatered in a waste oil tank, which is part of SWMU 4, prior to being transported and disposed of off-site by Beaver Oil Co. These wastes are disposed of as a special waste and are generated at an annual quantity of approximately 85,000 gallons. The Wastewater Treatment System (SWMU 4) also generates sludge, which is accumulated in the clarifier and emptied into a dumpster, which is part of SWMU 4, for transportation and disposal. Approximately 210 cubic yards of this waste are generated annually. This waste is transported by Fox Valley Disposal to Settlers Hill Landfill and Recycling in Batavia, Illinois, or Chemical Waste Management/CID No. 2, in Calumet City, Illinois, for disposal. The

TABLE 1
SOLID WASTE MANAGEMENT UNITS

| <u>SWMU Number</u> | <u>SWMU Name</u> | <u>RCRA Hazardous Waste Management Unit^a</u> | <u>Status</u> |
|--------------------|--|---|------------------|
| 1 | Former Outdoor Storage Area | Yes | Closed, Inactive |
| 2 | Former Indoor Storage Area | Yes | Closed, Inactive |
| 3 | Zinc Phosphating Fume Scrubber | No | Active |
| 4 | Wastewater Treatment System | No | Active |
| 5 | Laboratory Waste Satellite Accumulation Area | No | Active |

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

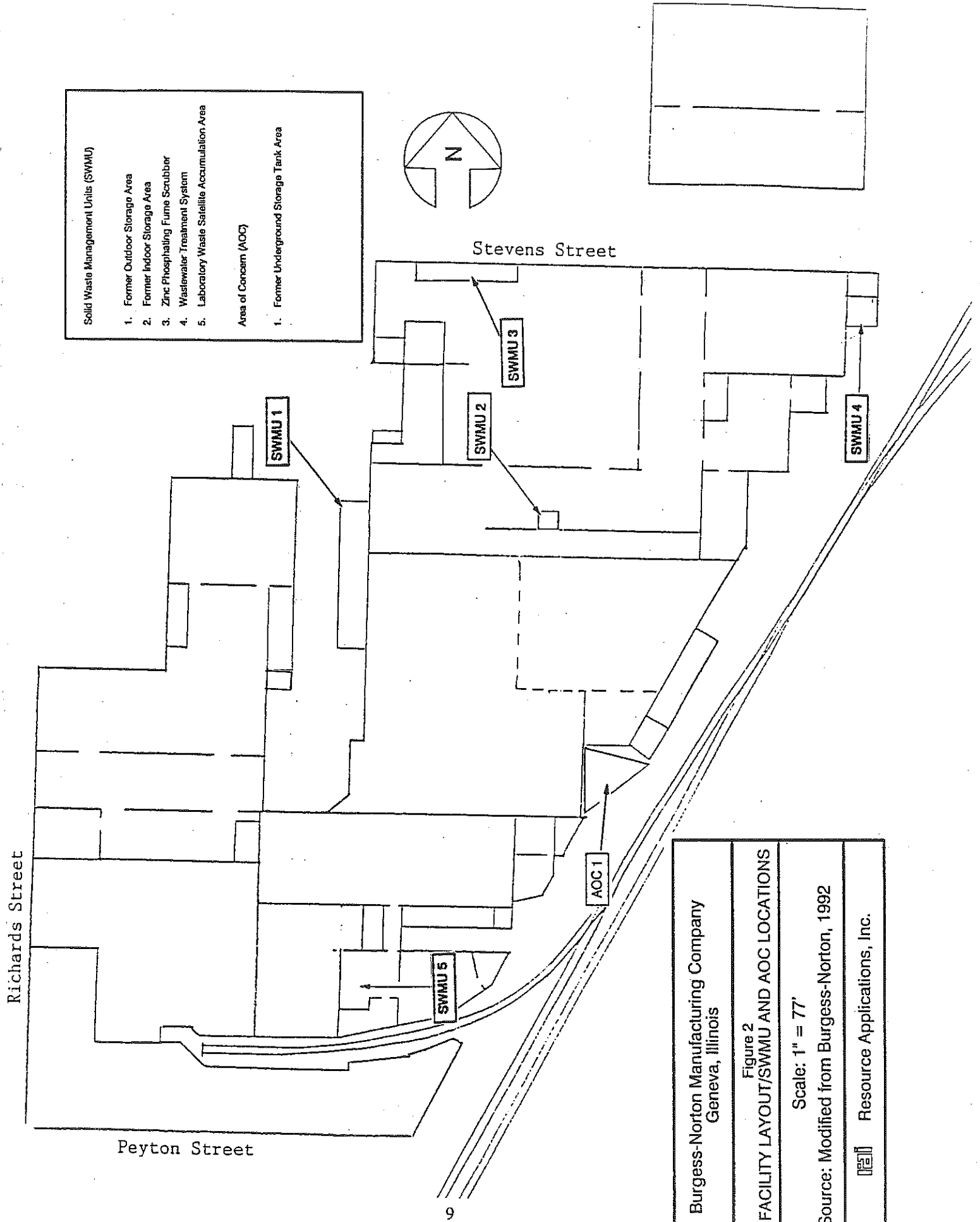


TABLE 2
SOLID WASTES

| <u>Waste/EPA Waste Code^a</u> | <u>Source</u> | <u>Solid Waste Management Unit</u> |
|---|--|------------------------------------|
| Waste Quench Oil and Sludge/NA | Quench Oil Tanks | Removed from process |
| Industrial Wastewater/NA | Zinc Phosphating Fume Scrubber, Process Equipment | 4 |
| Caustic Quench Sludge/NA ^b | Caustic Quench Tanks | 1 and 4 |
| Zinc Phosphate Sludge/NA ^c | Zinc Phosphating Tanks | 1 and 4 |
| Mixed Waste/NA | Furnace Soot, Wastes from Housekeeping Procedures, Waste Soap, and Sludge from Water Washers | Removed from process |
| Spent 1,1,1-Trichloroethane/(F001) ^d | Former Metal Degreasing Process | 2 |
| Spent Methanol/(F003) | Quality Control Laboratory | 2 and 5 |
| Spent Freon/(F002) | Quality Control Laboratory | 2 and 5 |
| Wastewater Treatment Sludge/NA | Wastewater Treatment System | 4 |

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b This waste was previously managed as a hazardous waste with a D000 code (due to zinc) because IEPA considered it a hazardous waste but not an EPA hazardous waste. Subsequently, the waste was managed under a D002 code (due to corrosivity).

^c This waste was previously managed as a hazardous waste with a D002 code.

^d This waste is no longer generated.

TABLE 2 (CONT'D)

SOLID WASTES

| <u>Waste/EPA Waste Code^a</u> | <u>Source</u> | <u>Solid Waste Management Unit</u> |
|---|-----------------------------|------------------------------------|
| Waste Oil/NA | Wastewater Treatment System | 4 |
| Waste Coolant/NA | Wastewater Treatment System | 4 |
| Zinc Phosphate Fumes | Zinc Phosphating Process | 3 |
| Used Lead-Acid Batteries | Battery Powered Equipment | Removed from process |

Notes:

- ^a Not applicable (NA) designates nonhazardous waste.
- ^b This waste was previously managed as a hazardous waste with a D000 code (due to zinc) because IEPA considered it a hazardous waste but not an EPA hazardous waste. Subsequently, the waste was managed under a D002 code (due to corrosivity).
- ^c This waste was previously managed as a hazardous waste with a D002 code.
- ^d This waste is no longer generated.

effluent from the Wastewater Treatment System (SWMU 4) is discharged into the Fox River under NPDES Permit No. IL0036331.

Fumes generated from the zinc phosphating process are managed by the Zinc Phosphate Fume Scrubber (SWMU 3). SWMU 3 does not generate any particulates. The water used to remove the fumes is sent to the Wastewater Treatment System (SWMU 4) for treatment.

Some of the forklifts used at the facility are battery powered. When spent, these lead-acid batteries are exchanged with the Exide Battery Company of Countryside, Illinois for new batteries as needed.

In the past, the caustic quench sludge and the zinc phosphate sludge were removed from the process and stored in 55- or 85-gallon drums in SWMU 1 prior to being disposed of off site, usually at Chemical Waste Management's Model City, New York landfill, as hazardous waste (D000 and D002). The zinc phosphate sludge was managed as a D000 waste because IEPA considered zinc to be hazardous, though EPA did not. After April 25, 1982, this waste was managed as a D002 waste. These wastes were hazardous only because of corrosivity, and are currently treated by the Wastewater Treatment System (SWMU 4). Larger quantities of spent 1,1,1-trichloroethane were formerly generated by degreasing processes no longer used and stored in SWMU 2 prior to disposal off site.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Burgess-Norton facility.

The only documented, unpermitted release is from three of the 14 Former Underground Storage Tank Areas (AOC 1). This release was of an unknown quantity of fuel oil or gasoline into the ground. The facility notified the Illinois Emergency Services Disaster Agency (IESDA) of the release on November 8, 1989, and obtained Incident No. 892276 (IESDA, 1989). The facility has hired Groundwater Technology, Inc. as a consultant. The facility and their consultant have investigated the problem, conducted soil sampling and installed monitoring wells. This information is unavailable in IEPA or EPA files, and, pursuant to the facility's legal counsel, the facility

representatives would not discuss this issue further. The facility is presently discussing a remediation strategy with its consultants. The location of one of the leaking USTs is shown in Figure 2.

There is no history of documented, unpermitted releases from any of the SMWUs.

2.5 REGULATORY HISTORY

Burgess-Norton submitted a Notification of Hazardous Waste Activity form to EPA on August 10, 1980 (Burgess-Norton, 1980a). The facility submitted a RCRA Part A permit application on November 18, 1980 (Burgess-Norton, 1980b). This application listed the following waste process codes and capacities: two S01 codes (20,000 and 2,500 gallon capacities) (SWMUs 1 and 2) and two S02 codes (incorrectly identified process tanks of 500 gallons each) for these. The application listed the following wastes: F001, F010, F012, D000, and D002. On April 21, 1981, Burgess-Norton filed an amended Part A permit application removing the F010 and F012 waste streams, stating that cyanide salts were not used in its quenching medium (Burgess-Norton, 1981). On April 25, 1982, the Part A permit application was revised removing the D000 waste stream and adding a D002 waste. (Burgess-Norton, 1982b). On June 3, 1988, IEPA notified the facility that it had withdrawn the Part A permit application in conjunction with approval of the facility's closure certification (IEPA, 1988a). Copies of the closure plan were not available from IEPA or EPA files. This action made the facility subject to generator-only regulations and formally closed the Former Outdoor Storage Area (SWMU 1) and the Former Indoor Storage Area (SWMU 2). Additional documentation of the closure of SWMUs 1 and 2 is not found in the files.

Some minor paperwork violations, e.g. failure to have a closure plan, failure to have submitted a contingency plan to appropriate local agencies, and failure to have "Danger" signs posted were noted during an IEPA inspection on February 8, 1982 (IEPA, 1982). The facility responded on February 15, 1982 that the violations had been corrected (Burgess-Norton, 1982a). No further documentation was found indicating IEPA's approval.

On May 21, 1984, Burgess-Norton was the subject of a Complaint and Compliance Order for failing to provide financial responsibility information (EPA, 1984a). This Order was withdrawn on

September 6, 1984 after it was determined that IEPA had misfiled the required information (EPA, 1984b).

The facility maintains two NPDES outfalls, one for storm water and non-contact cooling water, and the other for effluent from the Wastewater Treatment System (SWMU 4). The effluent from SWMU 4 was determined noncompliant in August 1986 (IEPA, 1988a). No further information was available, however, this was shortly after the facility had modified the wastewater treatment process. No other violations were found.

The facility reports that they maintain a facility-wide air permit. The facility has not had a history of air permit compliance problems and has not had odor complaints from area residents.

The facility had 14 USTs. The facility reports that all are inactive and have either been closed-in-place according to Illinois State Fire Marshall guidelines or removed. Three of the USTs in the Former USTs Areas (AOC 1) were found to have released heating oil and/or gasoline into the ground. IEPA will oversee the remediation.

There has been no CERCLA activity at this facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the Burgess-Norton facility.

2.6.1 Climate

The climate in Kane County is temperate and continental. The average daily temperature is 47.5°F. The lowest average daily temperature is 16°F in January. The highest average daily temperature is 83°F in July.

The total annual precipitation for the county is 35.62 inches (Ruffner, 1985). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1963).

The prevailing wind is from the west. Average wind speed is highest in March at 12 miles per hour from the north-northwest. The average wind speed is 10.3 miles per hour in a westerly direction (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Burgess-Norton facility reports that they are not located in the 100 or 500 year flood plain. According to the Flood Insurance Rate Map for Geneva, Illinois, the facility is located outside the 500-year flood plain boundary (FEMA, 1981).

Surface water from the site flows into storm sewers and is discharged under NPDES Permit No. IL0036331.

The nearest surface water body, the Fox River, is located 0.5 mile east of the facility and is used for recreational and water supply purposes.

2.6.3 Geology and Soils

No site specific geologic information was available in IEPA or EPA files, and pursuant to the advice of legal counsel, the facility representatives would not discuss the information obtained as part of the UST release investigation, so regional information is presented here. The soils underlying the facility consist of the Markham silt-loam group with 2 to 5 percent slopes (USDA, 1979). These soils are gently sloping and moderately well-drained. Typically, the surface layer of this soil group is a very dark grayish-brown and dark yellowish brown silty clay loam, underlain by a subsoil about 24 inches thick. The upper part of this subsoil typically consists of dark brown and dark yellowish brown silty clay loam, and the lower part consists of a yellowish brown and light yellowish brown silty clay loam. The underlying soils, to a depth of 60 inches, typically consists of a light yellowish-brown, calcareous silty clay loam till.

silty clay loam. The underlying soils, to a depth of 60 inches, typically consists of a light yellowish-brown, calcareous silty clay loam till.

Beneath the surface soils lie soils belonging to the St. Charles Moraine unit of the Yorkville Member of the Wedron formation (Willman and Lineback, 1970). These soils typically consist of mostly gray to dark gray clayey tills and locally silty clayey till. These soils contain abundant small pebbles, local lenses of silts, and, less commonly, lenses of sand and gravel. These deposits are from the Woodfordian substage of the Wisconsin stage of glaciation. These soils are estimated to be about 100 feet thick in the vicinity of the facility (Willman, 1971).

The uppermost bedrock beneath the facility is part of the Ordovician Maquoketa Group, consisting mainly of grey and green shale, with some oolitic limestones and dolomites in the upper half. Beneath the Maquoketa rocks are dolomites of the Galena-Platteville Group, sandstones of the Ancell (Glenwood-St. Peter) Group, and sandstones and dolomites of the Prairie du Chien group. Beneath the Ordovician rocks are sandstones, siltstones, and dolomites of Cambrian age, underlain by Precambrian granite basement at depth. The exact thickness of the above-mentioned units are not known; however, the combined thickness of the Silurian rocks, and the Ordovician Maquoketa and Galena-Platteville groups is approximately 500 feet (Willman, 1971).

2.6.4 Ground Water

An out-of-service well of unknown depth exists at the facility. In the past, this well was used to supply water for industrial and emergency purposes at the facility. Several monitoring wells are also located at the facility. These were installed as part of the facility's determination of the extent of release from the USTs.

No site-specific ground water information was available in IEPA or EPA files, and pursuant to the advice of legal counsel, the facility representatives would not discuss the information obtained as part of the UST release investigation, so regional information is presented here. The glacial tills in the vicinity of Burgess-Norton may contain some sand and gravel lenses, which are good sources of ground water. Domestic ground water supplies are readily available from sand and gravel. Dolomite lies directly beneath the glacial drift, and yields ground water at most locations through open crevices

and channels. The deeper Galesville sandstone (of Cambrian age) is encountered at a depth of between 1,000 and 2,000 feet, and is used for industrial and municipal ground water supplies. In addition, the Ordovician-St. Peter sandstone is a local source of large water supplies, and is approximately 500 feet thick in the vicinity of Geneva (Bergstrom, et al., 1955).

The location of the nearest off-site ground water well is not known. The City of Geneva obtains its drinking water from the Fox River. Ground water in the area generally flows south. The depth of shallow ground water on the site is not known, and pursuant to advice of legal counsel, the facility representatives would not discuss this subject further.

2.7 RECEPTORS

The Burgess-Norton facility occupies 7.3 acres in a residential area in Geneva, Illinois. Geneva has a population of about 12,000 people.

The Burgess-Norton facility is bordered on the north by an employee parking lot and residences; on the west by Richards Street and residences; on the south by Peyton Street, Burgess-Norton general offices, parking lot, and residences; and on the east by an abandoned railroad right-of-way, parking lot, and residences. The nearest school, the Fourth Street School, is located 1,000 feet east of the facility.

Facility access is controlled by fences, gates, and building doors. The facility has a 24-hour guard.

The nearest wetland, and surface water body, the Fox River, is located 0.5 miles east of the facility. The Fox River is used for recreational and water supply purposes.

An out-of-service well exists at the facility. In the past, this well was used to supply water for industrial and emergency purposes at the facility. Ground water is also used for municipal and industrial water supply purposes in the county.

Sensitive environments are not located on site. The nearest wetland environment is the Fox River, located 0.5 mile east of the facility (USDI, 1984).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Outdoor Storage Area

Unit Description: The Former Outdoor Storage Area is located in the alley that divides part of the site. The unit measures 75 feet by 12 feet and is on asphalt, reported to be 0.75 inch thick (see Photograph No. 1). The unit had no barricades to keep vehicles from entering.

Date of Startup: This unit began operation around 1980.

Date of Closure: This unit ceased operation in 1985 and RCRA closure was approved by IEPA in 1988 (IEPA, 1988b).

Wastes Managed: This unit managed the zinc phosphate sludge (D000, then changed to D002) and caustic quench sludge (D002) wastes in 55- and 85-gallon drums.

Release Controls: The unit had no secondary containment or release controls.

History of Documented Releases: No releases from this unit have been documented.

Observations: No evidence of release was noted. This unit was empty at the time of the VSI. The asphalt was in good condition, with no visible cracks. No drains are located near the unit, however a paved swale borders the unit on the west side, which drains north to a storm sewer.

SWMU 2**Former Indoor Storage Area**

Unit Description: The Former Indoor Storage Area is in the room north of the heat treating processes and measures approximately 7.5 feet by 12 feet (see Photograph No. 2). The unit was located on a concrete floor 8 to 12 inches thick. No floor drains are present in the vicinity of this unit.

Date of Startup: This unit began operation in 1980.

Date of Closure: This unit ceased operation in 1985 and RCRA closure was approved by IEPA in 1988 (IEPA, 1988b).

Wastes Managed: This unit managed spent 1,1,1-trichloroethane (F001), spent methanol (F003), and spent Freon (F002).

Release Controls: Aside from the concrete floor, this unit had no release controls or secondary containment.

History of Documented Releases: No releases from this unit have been documented.

Observations: This area is presently used to store maintenance equipment and has some minor oil spillage. The concrete floor was in good condition.

SWMU 3**Zinc Phosphating Fume Scrubber**

Unit Description: The Zinc Phosphating Fume Scrubber consists of a hood above the zinc phosphating process tanks which collects fumes and directs the fumes through an adjacent scrubbing unit (see Photograph No. 3). This unit is located on the south wall of the zinc phosphating room. The remaining vapor is then released to the air. The wastewater from this unit is treated in the Wastewater Treatment System (SWMU 4).

Date of Startup: This unit began operation about 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit controls the fumes from the phosphating process.

Release Controls: This unit discharges under a facility-wide air permit.

History of Documented Releases: No unpermitted releases from this unit have been documented.

Observations: No evidence of unpermitted release was noted. The unit is relatively new and appears to be in good condition.

SWMU 4

Wastewater Treatment System

Unit Description: The Wastewater Treatment System is located indoors at the northeast corner of the facility. The unit is located in two adjacent rooms. The unit has a pretreatment system for oily wastes which separates oil from water, and accumulates the oil in a separate tank. Water from the pretreatment system joins process wastewater and is further treated. This treatment consists of adding lime to raise the pH to 9.2 in order to form metal hydroxides. The above processes are performed in the south room. In the north room of this unit, a polymer is added as a flocculant. The wastewater is mixed and then run through a clarifier to settle out the metal hydroxides (see Photograph No. 4). The clarifier sludge is removed from process for off site disposal. Following clarification, the pH of the wastewater is lowered by the addition of sulfuric acid so that it is below 9. The wastewater is then chlorinated in a process that uses sodium hypochlorite tablets prior to discharge to the Fox River under NPDES Permit No. IL0036331.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit is active.

Wastes Managed: This unit manages all the process wastewater and aqueous wastes. Waste oil is collected by this unit and is periodically hauled off-site for recycling. The sludges generated by this unit are managed at this unit in the clarifier until they are moved to a dumpster prior to being disposed of off site as a special waste.

Release Controls: The building and process tanks serve as release controls. The unit is monitored and has the capacity to hold approximately two days worth of wastewater if necessary. The equalization tank holds approximately 10,000 gallons.

History of Documented Releases: No unpermitted releases from this unit have been documented.

Observations: The unit appeared to be operating properly at the time of the VSI.

SWMU 5 Laboratory Waste Satellite Accumulation Area

Unit Description: The Laboratory Waste Satellite Accumulation Area contains two drums (one for spent methanol, one for spent freon) located indoors approximately 100 feet west of the quality control laboratory. Several other drums containing waste oil were also located in this area (see Photograph No. 5).

Date of Startup: This unit began operation about 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit manages spent methanol (F003) and spent Freon (F002) from the quality control laboratory in 55-gallon drums. Several drums labelled waste oil were also present in this area.

Release Controls: The building serves as secondary containment as all the floor drains have been plugged.

History of Documented Releases: No releases from this unit have been documented.

Observations: No visual evidence of release was noted at this unit. However, a solvent odor was noted in this area. The spent methanol and spent Freon have reportedly been under accumulation at this unit for more than 90 days. The facility maintains that they are in compliance with their generator-only status. The facility states that the spent Freon and spent Methanol drums are both less than half full.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; the location of one of the USTs that leaked is shown in Figure 2. Pursuant to advice from legal counsel, the facility representatives would not provide the location of the other two leaking UST areas.

AOC 1 Leaking Underground Storage Tank Areas

The facility reports that they had 14 underground storage tanks (USTs) on this site, which were used to store gasoline and/or fuel oil. These tanks were located all over the site. These tanks were decommissioned by removal, or closed in place where removal was not practical and was allowed by the Illinois State Fire Marshall. Three of the USTs were identified as having leaked. The size of the release is not known. The facility notified IESDA on November 8, 1989, of the leaking tanks and obtained IESDA Incident No. 892276 (IESDA, 1989). The facility and their consultants, Groundwater Technology, Inc., are discussing remedial strategies. IEPA will review the information provided by the facility and its consultants prior to approving the completion of remediation.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Burgess-Norton facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1 Former Outdoor Storage Area

Conclusions: This unit was a paved area outdoors used to store drums containing caustic quench sludge and zinc phosphate sludge. The facility reports that this unit did not have any secondary containment. This unit has a nonexistent potential for release to ground water, surface water, air, or on-site soils as it has undergone RCRA closure, had its closure certification approved by IEPA, and was subsequently never used (IEPA, 1988b). Previously, the unit had moderate potential for release to the environment as it was located outdoors with no secondary containment.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 2 Former Indoor Storage Area

Conclusions: This unit was located inside the facility and used to store solvents from a degreasing process no longer used. Presently, this area is used to store some maintenance and housekeeping supplies. This unit has low potential for release to ground water, surface water, air or on-site soils as it has undergone RCRA closure, had its closure certification approved by IEPA, and is inactive

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(IEPA, 1988b). Previously, this unit had low potential for release to the environment due to its indoor location.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 3 Zinc Phosphating Fume Scrubber

Conclusions: This unit is located indoors in the zinc phosphating room and controls fumes from the zinc phosphating process. This unit has low potential for unpermitted release to ground water, surface water or on-site soils as it is located inside and manages air pollutants. This unit has low potential for unpermitted release to air because the fumes are removed.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 4 Wastewater Treatment System

Conclusions: This unit is located indoors at the northeast corner of the facility. This unit treats process wastewaters, zinc phosphating wastes, zinc phosphating scrubber water, and caustic quench wastes. This unit has low potential for release to ground water, air or on-site soils as it is located indoors. The unit has low potential for unpermitted release to surface waters as the operation is monitored and discharge to the Fox River is monitored under an NPDES permit.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 5 Laboratory Waste Satellite Accumulation Area

Conclusions: This unit consists of an indoor area on a concrete floor with two 55-gallon drums, each reportedly less than half full, to accumulate hazardous wastes (spent methanol and spent Freon) and several other drums of waste oil. This

RELEASED
DATE 5/5/99
RIN #
INITIALS WV

ENFORCEMENT
CONFIDENTIAL

unit is located inside the facility approximately 100 feet from the laboratory. This unit has low potential for release to ground water, surface water and on-site soils as it located indoors. This unit has moderate potential for release to air as noted by odors in the vicinity of this unit.

Recommendations: RAI recommends that the facility find a better way to manage the wastes in this unit to minimize the potential for air releases.

AOC 1 Leaking Underground Storage Tank Areas

Conclusions: The facility has notified IESDA of a release. The facility and its consultants are discussing remediation strategies.

Ground water: There is a high potential for contamination of ground water, due to the contaminated soils from three of the underground storage tanks.

Surface water: There is a low potential for release to surface water from this unit because the contamination is in the soils.

Air: There is a low potential for release to air from the area because the contamination is in the soils.

On-site soils: There has been documented release from three of the USTs to on-site soils. There is low potential for release to surface water and air from this area as the contamination is located in the soils.

Recommendations: IEPA has set generic cleanup objectives for releases from UST systems. A facility has the option to request site specific cleanup objectives. Therefore, RAI recommends that remediation be performed until IEPA guidelines are met.

RELEASED
 DATE 5/5/99
 RIN #
 INITIALS MT

ENFORCEMENT
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TABLE 3
 SWMU AND AOC SUMMARY

| <u>SWMU</u> | <u>Dates of Operation</u> | <u>Evidence of Release</u> | <u>Recommended Further Action</u> |
|---|---------------------------|-------------------------------------|--|
| 1. Former Outdoor Storage Area | 1980 to 1988 | None | No further action. |
| 2. Former Indoor Storage Area | 1980 to 1988 | None | No further action. |
| 3. Zinc Phosphating Fume Scrubber | 1988 to present | No evidence of unpermitted release | No further action. |
| 4. Wastewater Treatment System | 1973 to present | No documented unpermitted release | No further action. |
| 5. Laboratory Waste Satellite Accumulation Area | 1988 to present | Noticeable odor during VSI | Minimize the potential for air releases. |
| <u>AOC</u> | <u>Dates of Operation</u> | <u>Evidence of Release</u> | <u>Recommended Further Action</u> |
| 1. Former UST Areas | Unknown | Documented release to on-site soils | Remediate per IEPA guidelines |

REFERENCES

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EPA, 1984b. Letter from EPA to Burgess-Norton, September 6.

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 062 406 038

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Burgess-Norton Manufacturing Company, Plant 1

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
737 Payton Street

03 CITY
Geneva

04 STATE IL 05 ZIP CODE 60134 06 COUNTY Kane 07 COUNTY CODE 08 CONG DIST

09 COORDINATES: LATITUDE 41 54 52 N LONGITUDE 088 14 48 W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Illinois Route 38 to Geneva, Illinois. Turn north on Richards Street, go to Payton Street. Facility is on the northeast corner of Richards and Payton.

III. RESPONSIBLE PARTIES

01 OWNER (If known)
Armsted Industries

02 STREET (Business, mailing, residential)
205 North Michigan Avenue 44th floor

03 CITY
Chicago

04 STATE IL 05 ZIP CODE 60601 06 TELEPHONE NUMBER (312) 645-1700

07 OPERATOR (If known and different from owner)
Same as owner

08 STREET (Business, mailing, residential)

09 CITY

10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

- ☒ A. PRIVATE ☐ B. FEDERAL: (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

- ☒ A. RCRA 3010 DATE RECEIVED: 08 / 10 / 80 ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / ☐ C. NONE
MONTH DAY YEAR MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

- ☒ YES DATE 04 / 30 / 92 ☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ NO ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: (Specify)

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS (Check one)

- ☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1903 Present
BEGINNING YEAR ENDING YEAR ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Quenching oil, aqueous sodium hydroxide, sodium hypochlorite, zinc phosphate, 1,1,1-trichloroethane, trichlorotrifluoromethane, sulfuric acid, methylene chloride, methanol, stearate soap, lead-acid batteries.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There is known soil contamination from AOC 1. The area has been impacted due to release of fuel oil or gasoline from three of the underground storage tanks. The facility is aware of the situation and is discussing remediation strategies with their consultant. A voluntary remediation is planned.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

- ☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Pierard

02 OF (Agency/Organization)

EPA Region 5

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

William T. Earle

05 AGENCY

06 ORGANIZATION

Resource Applications, Inc.

07 TELEPHONE NUMBER

(312) 332-2230

08 DATE

06 / 11 / 92
MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Burgess-Norton Manufacturing Co. Plant 1
737 Peyton St.
Geneva Illinois
ILD 062 406 038

Date: April 30, 1992

Primary Facility Representative: Mr. Frank J. Smith, Manager of Environmental Engineering
Representative Telephone No.: (708) 232 3297
Additional Facility Representatives: Mr. Guy E. West, Chief Metallurgist/Laboratory Manager
Mr. Daniel S. Corrigan, Personnel/Safety Supervisor
Mr. Scott Burich
Mr. John Medgysei

Inspection Team: William Earle, Resource Applications, Inc. (RAI)
Jeff Indeck, RAI

Photographer: William Earle

Weather Conditions: Sunny, temperature about 80°F, calm

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at approximately 2:00 p.m. The tour included all areas of the production facility and all SWMUs and the AOC. Pictures of each SWMU and the AOC were taken.

The tour concluded at 4:20 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:30 p.m.



Photograph No. 1

Location: SWMU 1

Orientation: South

Date: 4/30/92

Description: Former Outdoor Storage Area. This area was used to store zinc phosphating and caustic quench wastes.



Photograph No. 2

Location: SWMU 2

Orientation: Southeast

Date: 4/30/92

Description: Former Indoor Storage Area. This area is currently used to store some housekeeping and maintenance supplies.



Photograph No. 3

Location: SWMU 3

Orientation: Southeast

Date: 4/30/92

Description: Zinc Phosphate Fume Scrubber. This unit controls odors from the zinc phosphating operation with a water spray.



Photograph No. 4

Location: SWMU 4

Orientation: Northeast

Date: 4/30/92

Description: Wastewater Treatment System, south room. This room contains the oil/water separator, precipitant tank, and waste oil tank.



Photograph No. 5

Location: SWMU 5

Orientation: West

Date: 4/30/92

Description: Laboratory Waste Satellite Accumulation Area. One of the drums contains spent methanol, the other spent Freon TF.



Photograph No. 6

Location: AOC 1

Orientation: Northwest

Date: 4/30/92

Description: One of Several Former Underground Storage Tank Area. Note monitoring well in center of picture with concrete collar.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

FRANK SMITH

41

SCOTT BURICH.

JOHN MEDGESI

BURGESS-NORTH MFG. CO.

BEGAN OPERATIONS IN 1903

BEGAN HERE. BEGAN IN PART OF FACILITY
METAL FABRICATION.

HAZARDOUS WASTE STORAGE OPS IN 1976.

UNKNOWN DISPOSITION PRIOR.

FRANK AND PRIOR TO BN.

200,000 SQ FT FLOOR SPACE.

LAND SIZE +/- 5/6 ACRES.

BN IS DIVISION OF AMSTER.

PURCHASED BN IN 64 OR 65.

UNK FAC TITLE MAYBE AMSTER.

BECAUSE WHOLLY OWNED BY AMSTER.

CT CORP SYSTEM.

AGENT AUTH TO RECEIVE CORRES
ON BEHALF OF AMSTER.

APPLIES TO ALL AMSTER DISPOSITION.

AGENT NOT PART OF CORP. CHAIN.

RESIDENCES ON ALL 4 SIDES

GENERAL OFFICES TO S.

PARKING LOT TO N BUT HOUSE ON BLOCK
E TO RR ROW E LOT BEFORE HOUSE
W ACROSS STREET.

FACILITY PREDATES HOUSES.

MUNICIPAL GENEVA

SANITARY MUNICIPAL.

STORM SYSTEM DRAIN & SEWER.

OUTFALL TO FOX RIVER.

1 DEEP WELL. OLD INDUSTRIAL USE (FIRE)

NO LONGER USED.

STORM TO FOX RIVER

NOT TREATED PRIOR TO DISCHARGE

FOX RIVER IS CLOSEST SURFACE WATER.

CITY PARK WHEELER 0.5 MILES NE.

RECREATION.

HIGH SCHOOL 1/4 NW

4TH ST SCHOOL ELEM 3 BLKS.

HOSPITAL SW 2 MILES.

FACILITY IS SECURE. FENCED & GATED

SECURITY 2 & 3 SHIFT PLUS WEEKENDS.

FACILITY OPERATES 3 SHIFTS. GUARD DURING 2 & 3

225 PEOPLE, MOST IN 1ST SHIFT

60 IN GEN OFFICES

2ND FACIL IN GENEVA, DEKALA, MUSKOGEE MT

CLAMORE OULA

FACILITY GENERATES PISTON PINS.

MADE FROM BAR OR COIL STEEL

MOST OF PRODUCTION PROCESS IS MECHANICAL.
METAL IS HEAT TREATED.

CUT, MACHINE, GRIND, COLD FORM.

METAL COMES TO LINE COATING

BAR & RUST PREVENT. PETROLEUM BASED.

NOT CLEANED.

COLD CHAMFER PROCESS STARTS & GLUE HEADER.

METAL IS FORMED, DRILLED, CUT, GROUND ETC.

HEAT TREAT FOLLOWS FORMING BUT PRIOR TO
FINAL FINISH GRINDING.

Zn PHOSPHATING IS PRIOR TO COLD FORMING
HELPS FOR STEARATE LUBRICANT

PETROLEUM FINISH AS RUST PREVENTATIVE.

Zn PINS DONE AS ACID BATH.

COATING LINE OPERATORS MONITOR BATCHES.

Zn PROCESS LIQUID DECANT TO HOLD TANK

Zn + Fe PROC. MANUAL REMOVE FROM TANK

TO 55 OR 85-GAL DRUMS.

MANAGED IN
OUTSIDE STORAGE

TYPICALLY STEEL, TYPICALLY LINED.

ABOUT 90% OF TIME OF CLOSURE, BEGAN

PH ADJUST & NADH TO A PH. NOW DISPOSED
OFF SITE BUT NOT AS HAZ WASTE.

ADJUSTED IN BATCH TANKS.

44

WATER FROM ST PETERSBURG.

SOME WELLS TO PECOINICA OR GALETS TO MIX

FACILITY. HAS WW TREATMENT SYSTEM

PRECIPITATE METAL HYDROXIDES

MANAGED AS NON HAZ CAKE

Zn PHOS MANAGED IN SOLID FORM. DRUMMED.

CHEM WASTE HAUL & TSD.

MODEL CITY, N.Y.

SWITCHED IN 86

CAUSTIC QUENCH WAS SODIUM HYDROX

FOLLOWED HEAT TREAT. PROCESS IN TANKS

MANAGED IN 55 OR 85 g

MOVED BY PUMPS OR SHOVELS.

PROBABLY USED SAA.

DRUMS MOVED TO STORAGE AREA

WHEN FULL

FULL DRUMS TAKEN TO OUTSIDE STORAGE AREA

HAZARD DUE TO HIGH PH.

LANDFILLED AT MODEL CITY.

Zn & WZOH MAY HAVE GONE TO WM IN ^{ALL} EWER

WASTE IS GEN BUT NOT DISPOSED OFF-SITE

TREATED IN WWT SYSTEM.

NO CYANIDES USED IN PROCESSES.

F 010 QUENCH BATH FROM HEAT TREAT.

F 012 QUENCH SWAGE FROM HEAT TREAT

NOW SWAGE TO CYANIDE

NOT ANSWERED BY EPA, BUT EPA WAS NOTIFIED.

CHANGE WAS MADE BY IEPA FOLLOWING
CLOSURE.

ALSO HAD A SIMILAR PROCESS TO OIL.

MANAGE SEPARATE FROM CAUSTIC SLUDGE.

COLLECTED TO OIL FROM BATH.

SHIPPED OFF SITE FOR RECYCLE FROM RECYCLER
REFINERY PRODUCTS CO. MILLER PARK.

HANDLED IN BULK - PORT 500 g TANKS.

TANKS WERE EMPTIED BY TANK TRUCK.

BULK TANKS STORED IN MAINT WHEN EMPTY

AT PROCESS DURING FILLING. UNIK WHEN FULL
TO TANK TRUCK FOR EMPTYING.

~~THE~~ PROCESS DECISION BASED IN

METAL REQUIREMENTS OF QUENCHING.

TCA USED AS A DEGREASER.

COLD PARTS CLEANING IN DIP TANK.

NO STILL.

SLUDGE REMOVED. LIQUID REMOVED.

BOTH MANAGED TOGETHER.

MANAGED IN 55-g. DRUMS.

Probably
stored in
drum.

AREA

AREA
FILE

DRUMS: MANAGER IN INSIDE STORE AREA.

4 AT STORE AREAS ASSOC TO TCA.

ESTIMATES OF VOL% TCA 20 AM, Q: 20 Zn 100 DRUM

SOLVENT WENT TO OFF SITE RECYCLER -

SAFETY KREEN / GEN SOLU - BAKER BLAKESLEY

LARAMIE AV IN CICERO

4-K ELGIN FACILITY.

FREON WASTE TMC TRICHO TRIFLOR + METH CHLOR

+/- 50%.

USED AS A LAB REAGENT, CLEANER &
FILTER MEDIA.

MOST CONSUMED IN PROCESS. REST TO 55-g

ACCUUM DRUM. DRUM NEAR HW STORE AREA

+/- 30' AWAY

1 DRUM/YEAR MANAGED LIKE TCA.

METHANOL - USED IN LAB TO ETCH STEEL SAMPLES

WASTE METHANOL AND ALID

SENT TO RECLAIM/RECYCLER

PH NEUTRAL PRIOR TO DISPOSAL

VERY SMALL AM.

+/- 100 ml DAY. < 1 DR/YEAR.

MUCH CONSUMED IN PROCESS.

45 LBS, 85 CIL, CP 10/86, Pot Rel,

47

WASTE STREAMS SINCE 90. UNKNOWN

LAST Zn, CAUSTIC AS HW IN 88

FREON NOT GEN. NOW. ^{5 HR} LONG TRAV PROCESS + EVAP.

TCA NOT FOR 2 YRS

Sum vol FREON & METH.

METH IN 55-g DRUM.

2 DRUMS IN GAA METH and FREON.

OUTSIDE AREA ASPHALT. 12' x 75' x 0.75"

NO Z⁰ CONTAIN OR RELEASE CONTROL

NO DRAINS.

START +/- 1980: STOPPED IN 85

JAN 88 CERT. TO IEPA. ACKN IEPA 6/88

CLEAN CLOSURE & NO REMEDIATION.

LONG CORRESP PROCESS FOR CLOSURE.

MANAGER Zn + QUENCH CAUSTIC.

NO RELEASES, NO ACCID, SPILLS.

INSIDE AREA CONCRETE 7.5' x 12' x 12"

NO Z⁰ OR REL CON

SOLV. TO AREA TCA.

SEP FROM SAT ACC AREA

BEGIN 1980, CEASED ABOUT 85, CLOSED 88

NO SPILLS, RELEASES ETC.

GAA IN SEP AREA

SAA IS SEP AREA OUTSIDE LAB

PRIOR TO CLOSING '84

1 DRUM METH, 1 DRUM FREON

ON CEMENT. NO DRAINS. NO SPILLS.

FACILITY OPERATES AS CE SQG

DOESN'T KNOW HOW STATE REGS FACIL.

NO INSPECT SINCE CLOSURE.

NO NEW STOR. AREAS

NO SO₂ STORAGE

NO OTHER STORAGE

NPOES. TWO OUTFALLS. OUTFALLS TO FOX RIVER

BOTH ONLY SELF MONITORING.

T, PH, BOD, TSS, FOGG.

IEPA NO ENFORCEMENT ACTIONS.

FACILITY WIDE PERMIT

NO SO₂ STORE

WASTES ACCUM & STORED IN SAME AREA.

DRUM STORAGE OUTSIDE < 75

DRUM STORAGE INSIDE < 75

LARGE STORAGE ARE

TANKS ARE PROCESS TANKS TO PROCESS CHEM.

WW1

PROCESS CHEMIS MANAGED IN UNIQUE AREA
CHEMIS IN 55-g DRUMS

GRINDING COOLANT SYSTEM. SOL OIL SYS 15K g
TSP 7K gAL. SWITCH IN +/- 24
TRI SODIUM PHOSPHATE

OVERGRAP T, DIC DRY & ABSORBANTS
SPECIAL WASTE
BULK. ROLLOFF DUMPSTER

INDUSTRIAL
COMBINED WASTE MANAGED IN ROLLOFF
USE SPECIAL WASTE PERMIT
GIVEN REFUSE AS SEPARATE.

COOLANT IS PETROL BASED. EMULSION.
METAL SENT OFF HATED AS METAL SCRAP.
CLOSED LOOP SYSTEM, METAL ON MEMBRANE

MAINTENANCE FLUIDS MANAGED IN BULK STORE
LIKE Q.O.I.

FORK LIFT & MAINT. Some propane, some
LEAD ACIDS.

Now all aqueous fluids to WWT Z waste

WWT & O.I.

Metal hydroxide Sludge

Line Testing - By Line Operator.

~~LAB~~ - Line Fluids not managed as spec waste.
CENTRAL TREATMENT.

WWT Smol Hb. 73.

TREATED INDUSTRIAL WASTEWATER.

PH, 6 SETTLING.

PH ACID & CAUSTIC

SETTLING - CHEMS LIME COAG

ANION POLYMER AS FLOC

CONTINUOUS TREATMENT

EQUILIZATION BASIN CONCRETE & EPOXY

10K SIZE. 1/2 IN GROUND AS PART OF

FOUNDATION.

Also HAD CLARIFIER.

55 g DRUMS FOR WWT.

FINAL DISCHARGE TO SANITARY.

POSSIBLE TO ADJUST PRIOR TO DISCHARGE.

SOLIDS TO SLUDGE STORE TANK

REMOVED & HAULED AS SPEC WASTE

REFINERY PRODUCTS. Not only solids.

Also GRAV SEP FOR OILS.

Oils & ^{HYDROX} SLUDGE TO SEP CLARIFIER.

NOW 3 STREAMS OIL, metal HYDROX, FILTER PAPER.

GROSS OILS, THEN FINE SOLIDS, THEN EMULSION &.

No tank integrity testing. Tanks in enclosed base
drain to WWT

LAM OVERLACK CYEM WASTE. PERIODIC HOUSE CLEANING.

2 COMPLAINTS. NOISE ON SCRUBBER.
SPEAKER IN FACILITY.

GRINDING / SCRUBBER.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Frank J. Smith
Manager of Environmental Engineering
Burgess-Norton Manufacturing Company, Plant 1
737 Peyton Street
Geneva, Illinois 60134

Re: Visual Site Inspection
Burgess-Norton Manufacturing Company,
Plant 1
Geneva, Illinois
ILD 062 406 038

Dear Mr. Smith:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kevin M. Pierard", written over a horizontal line.

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

AMSTED INDUSTRIES

INCORPORATED

44TH FLOOR - BOULEVARD TOWERS SOUTH
205 NORTH MICHIGAN AVENUE - CHICAGO, ILLINOIS - 60601

RECEIVED

APR 30 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

LAW DEPARTMENT

DIRECT DIAL NUMBER

(312) 819-8482

TELECOPIER (312) 819-8484

29 April 1992

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: Visual Site Inspection
Burgess-Norton Mfg. Co.
ILD 062 406 038

Dear Mr. Pierard:

This is in reply to your letter of April 20, 1992 to Mr. Smith.

On behalf of Burgess-Norton Mfg. Co. division of AMSTED Industries Incorporated, we are allowing your request to inspect the subject facility subject to the following conditions and limitations.

As we understand the preliminary assessment/ visual site inspection (PA/VSI), this is the initial step in a corrective action process. You should be aware that B-N does not have a RCRA treatment, storage or disposal permit, and is not seeking such a permit. As such, B-N is not subject to review under this RCRA program. B-N had Part A interim status as a storage facility, but this storage facility underwent Illinois EPA approved closure in 1987.

The statutory authority for corrective action in RCRA is Sec. 3004(u), and only applies to "a treatment, storage or disposal facility seeking a permit under this subchapter." Since B-N is not seeking such a permit, that section does not provide authority for such an inspection. Further, corrective action authority may apply where there are identified releases of hazardous wastes or constituents. An acknowledged goal of your described inspection is to determine if any such release has occurred. There is no statutory authority to investigate non-RCRA units not known to involve such releases.

Amsted
INDUSTRIES

Page 2

This statutory interpretation is also supported in the implementing regulations at 40 CFR 264.100 and .101 which clearly only apply prospectively to facilities seeking a permit for the treatment, storage or disposal of hazardous waste.

However, as an accommodation to your contractor due to the scheduled inspection date of April 30, and without any agreement from B-N that any further actions are required under the applicable statute and regulations, B-N will allow the PA/VSI to take place, but only within the expressed limitations set forth in your letter of April 20, 1992.

Please address any further communications in this matter to the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward J. Brosius". The signature is fluid and cursive, with a long horizontal stroke at the end.

Edward J. Brosius
Assistant General Counsel
and Assistant Secretary

cc: F.J.Smith



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 20, 1992

Mr. Frank Smith
Burgess-Norton Mfg. Co.
737 Peyton St.
Geneva, IL 60134

Re: Visual Site Inspection
Burgess-Norton Mfg. Co.
ILD 062 406 038

Dear Mr. Smith:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

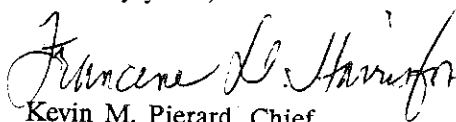
April 21, 1992
Page 2

The VSI has been scheduled for April 30, 1992, at 9:00 a.m. The inspection team will consist of William Earle and Jeff Indeck of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Larry Eastep, IEPA
Cliff Gould, IEPA

ATTACHMENT II

Burgess-Norton Mfg. Co.
737 Peyton St.
Geneva, IL 60134

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
 - What are the start-up and closure dates of the above SWMUs?
 - What types of wastes are the SWMUs currently/formerly used for?
 - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
 - What are the average volumes and rates of generation of waste streams?
 - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding operations and any other owner/operators at this location.
 3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
 4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

Facility Name BURGESS-NORTON MFG. CO.
 Location (City, State) GENEVA, IL.
 EPA I.D.# ILD 062406038
 Reviewer Name STEPHENSON
 Date of Review 3/17/86

SUMMARY OF FACILITY CERTIFICATION
 REGARDING POTENTIAL RELEASES
 FROM SOLID WASTE MANAGEMENT UNITS

(1) Are there any solid waste management units?

Yes X No _____ Undetermined _____

(2) If answer to (1) is Yes, list the units by type, number and operating status. If answer to (1) is No or undetermined, go to Question (5).

| | Type of Unit | Status |
|----|--|---------------|
| a. | <u>TANK #1 - ABOVE-GRADE, CARBON STEEL</u> | <u>ACTIVE</u> |
| b. | <u>TANK #2 - ABOVE-GRADE, STEEL</u> | <u>ACTIVE</u> |
| c. | <u>TANK #3 - ABOVE-GRADE, STEEL</u> | <u>ACTIVE</u> |
| d. | <u>WASTEWATER TREATMENT UNIT - ABOVE-GRADE</u> | <u>ACTIVE</u> |
| e. | _____ | _____ |
| f. | _____ | _____ |
| g. | _____ | _____ |
| h. | _____ | _____ |
| i. | _____ | _____ |
| j. | _____ | _____ |

(3) For each type of unit listed in (2), summarize the types and volumes of wastes handled.

| | Type of Unit | Type of Waste | Volume of Wastes |
|----|----------------------------------|---|---------------------------------|
| a. | <u>TANK #1</u> | <u>WASTE METALWORKING OILS (NON-HAZ)</u> | <u>3,240 GAL. MAX. CAPACITY</u> |
| b. | <u>TANK #2</u> | <u>WASTE METALWORKING COOLANTS (NON-HAZ)</u> | <u>2,000 GAL. MAX. CAPACITY</u> |
| c. | <u>TANK #3</u> | <u>WASTE COOLANT & OIL FROM GRINDING SYS. (NON-HAZ)</u> | <u>2,000 GAL. MAX. CAPACITY</u> |
| d. | _____ | _____ | _____ |
| e. | _____ | _____ | _____ |
| f. | <u>WASTEWATER TREATMENT UNIT</u> | <u>WASTE OILS & SUSPENDED SOLIDS.</u> | <u>1,400 GAL.</u> |
| g. | _____ | _____ | _____ |
| h. | _____ | _____ | _____ |
| i. | _____ | _____ | _____ |
| j. | _____ | _____ | _____ |

- (4) Summarize all releases of hazardous waste or constituents, and check box as to whether company claims it was fully corrected.

| | <u>Releases</u> | <u>Corrected?</u> | | |
|----|-----------------|------------------------------|-----------------------------|---------------------------------------|
| a. | <u>None</u> | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| b. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| c. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| d. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| e. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| f. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| g. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| h. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| i. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |
| j. | | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Undetermined <input type="checkbox"/> |

(5) Certification: Yes ☒ No ☐

(6) Is additional information necessary? Yes ☐ No ☒

(7) Comments: WASTEWATERS ARE DISCHARGED TO THE CITY OF GENEVA
MUNICIPAL SANITARY SEWER SYSTEM.



BURGESS-NORTON MFG. CO.

737 PEYTON STREET • GENEVA, ILLINOIS 60134

(312) 232-4100 • TELEX 720-449

14D 062-406-038

CERTIFIED MAIL -
RETURN RECEIPT
REQUESTED.

April 3, 1986

Lawrence W. Eastep, P.E., Manager
Permit Section
IEPA-DLPC
2200 Churchill Road
Springfield, IL 62706

CLOSURE PLAN REVIEW
BURGESS-NORTON MFG. CO., PLANT 1
U.S. EPA I.D. #062406038
IEPA I.D. #0890350008

Dear Mr. Eastep:

Upon review of the "Certification Regarding Potential Releases From Solid Waste Management Units" submitted to you 11/22/85, as well as the "Revised Closure Plan" submitted to Richard Carlson, Director IEPA 2/13/86, I have discovered an error in both. This error is on Page 2 of the Exhibits to the "Certification" and Page 2 of the "Revised Closure Plan."

The waste material generated from Burgess-Norton's Waste Pretreatment Plant is not, and should not, be classified as a hazardous waste. It should likewise not have an EPA HW# associated with it, and should not specifically have EPA HW#F006 - Wastewater Treatment Sludges From Electroplating Operations - Hazard Code T (cadmium, hexavalent chromium, nickel, cyanide 'complexed').

This waste stream has been analyzed by Chemical Waste Management (Attachment #1). This analysis indicates this waste stream to be non-hazardous according to RCRA and Illinois Administrative Code Title 35. IEPA has issued a Non-Hazardous Supplemental Permit #950170 for disposal of same (Attachment #2).

CLOSURE PLAN REVIEW
BURGESS-NORTON MFG. CO., PLANT 1
U.S. EPA I.D. #062406038
IEPA I.D. #0890350008 Continued ---

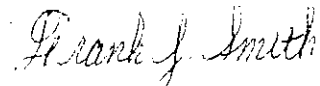
Burgess-Norton Mfg. Co. has no electroplating operations. It does have a zinc phosphate manufacturing process. Because of same, the process wastewater discharged from Burgess-Norton to the City of Geneva Sanitary Sewer System was covered by the "Electroplating" Federal Catagorical Pretreatment Standards and is presently covered by the "Metalfinishing" Catagorical Pretreatment Standards.

The use of the terms "Electroplating" in the Pretreatment Standards and the Hazardous Waste Regulations, but not interchangeably, led the writer to the aforementioned error in the "Certification" and "Revised Closure Plan." Pages 2 and 3 from the "Certification" demonstrate that the waste stream is not from treatment of electroplating wastewater. I have included them as Attachments #3 and #4 and have corrected the original error on Page 2.

Should you have any questions concerning this correspondence, do not hesitate to contact me.

Sincerely,

BURGESS-NORTON MFG. CO.



Frank J. Smith
Environmental Engineer

CC - B-N/SEKelm
File: Environmental Engineering - Plant 1
Facility Closure

AMSTED/EJBrosius

IEPA/Richard Carlsen, Director (Springfield)
Mark Haney (Springfield)

✓ U.S. EPA
RCRA Activities
Region V
P.O.Box A3587
Chicago, IL 60690
Attn: ATKJG

BURGESS-NORTON MFG CO

03/07/84

GENEVA, IL

SRCE: SAL SITE: CD2

9269

SEWAGE TREATMENT SLUDGE

SPECIAL WASTE ANALYSIS REPORTLABORATORY: Chemical Waste Management

Technical Center

PROFILE SHEET RECEIVED ON: 9/04/84 REPRESENTATIVE SAMPLE RECEIVED ON: 9/04/84CERTIFICATE OF REP. SAMPLE RECEIVED: 9/04/84 SAMPLE TAKEN: 8/17/84PROPOSED TREATMENT/DISPOSAL FACILITY: CID II

THE ANALYSES BELOW REPORTED WERE SELECTED BY ME, BASED UPON THE GENERATOR'S REPRESENTATIONS IN THE PROFILE SHEET AND ANY APPLICABLE WASTE ANALYSIS PLAN ESTABLISHED BY THE PROPOSED FACILITY FOR WASTE OF THIS TYPE. ANALYSES REQUIRED BY A WASTE ANALYSIS PLAN ARE INDICATED BY AN ASTERISK (*).

DATE OF ANALYSIS: 10-10-84 LAB MANAGER: John W. Kellogg

CWM #9269

| Test | As Received | EPT Leachate | Analyst Initials | Test | As Received | Leachate | Analyst Initials |
|--|------------------|---------------|------------------|---|----------------|----------|------------------|
| Specific Gravity | | | | | | | |
| pH <u>10.4 Solution</u> | <u>7.7</u> | | | | | | |
| Acidity, % as | | | | | | | |
| Alkalinity, % as | | | | Phenols, mg/l | <u><10</u> | | |
| C O D, mg/l | | | | Cyanides, as CN, Total, mg/l | <u><10</u> | | |
| B O D, mg/l | | | | Cyanides, as CN, Free, mg/l | | | |
| Total Solids @ 105°C | <u>27.25%</u> | | | | | | |
| Total Dissolved Solids, mg/l | | | | Nitrogen, Ammonia, as N, mg/l | | | |
| Total Suspended Solids, mg/l | <u>NA</u> | | | Nitrogen, Organic, as N, mg/l | | | |
| Residue on Evaporation @ 180°C | | | | Total Kjeldahl Nitrogen, as N, mg/l | | | |
| | | | | | | | |
| Flash Point, F° | <u>>212</u> | | | Total Alkalinity (P), as CaCO ₃ , mg/l | | | |
| Ash Content, on Ignition | <u>15.87%</u> | | | Total Alkalinity (M), as CaCO ₃ , mg/l | | | |
| Heating Value, BTU/lb | | | | Total Hardness, as CaCO ₃ , mg/l | | | |
| "Acid Scrub," gNaOH/g | | | | Calcium Hardness, as CaCO ₃ , mg/l | | | |
| | | | | Magnesium Hardness, as CaCO ₃ , mg/l | | | |
| Arsenic, as AS, mg/l | <u>0.61</u> | | | | | | |
| Barium, as Ba, mg/l | <u>258</u> | <u>0.68</u> | | | | | |
| Boron, as B, mg/l | | | | Oil and Grease, mg/l | | | |
| Cadmium, as Cd, mg/l | <u>2.57</u> | <u>0.01</u> | | | | | |
| Chromium, Total as Cr, mg/l | <u>73.2</u> | <u>0.01</u> | | | | | |
| Hexavalent Chromium @ Cr, mg/l | | | | Aldrin, mg/l | | | |
| Copper, as Cu, mg/l | <u>81.8</u> | | | Chlordane, mg/l | | | |
| Iron, Total as Fe, mg/l | | | | DDT's, mg/l | | | |
| Iron, dissolved, as Fe, mg/l | | | | Dieldrin, mg/l | | | |
| Lead, as Pb, mg/l | <u>299</u> | <u>0.14</u> | | Endrin, mg/l | | | |
| Manganese, as Mn, mg/l | | | | Heptachlor, mg/l | | | |
| Magnesium, as Mg, mg/l | | | | Lindane, mg/l | | | |
| Mercury, as Hg, mg/l | <u>0.0151</u> | | | Methoxychlor, mg/l | | | |
| Nickel, as Ni, mg/l | <u>180</u> | | | Toxaphene, mg/l | | | |
| Selenium, as Se, mg/l | <u><0.05</u> | | | Parathion, mg/l | | | |
| Silver, as Ag, mg/l | <u>2.00</u> | | | 2, 4, D, mg/l | | | |
| Zinc, as Zn, mg/l | <u>2960</u> | <u>0.28</u> | | 2, 4, 5, TP (Silvex), mg/l | | | |
| | | | | PCB's, mg/l | <u><5.0</u> | | |
| | | | | | | | |
| Bicarbonates, as HCO ₃ , mg/l | | | | | | | |
| Carbonates, as CO ₃ , mg/l | | | | | | | |
| Chlorides, as Cl, mg/l | | | | | | | |
| Fluorides, as F, mg/l | | | | | | | |
| Nitrate, as NO ₃ , mg/l | | | | | | | |
| Nitrite, as NO ₂ , mg/l | | | | | | | |
| Phosphate, as P, mg/l | | | | | | | |
| Sulfate, as SO ₄ , mg/l | | | | | | | |
| Sulfides, as S, mg/l | <u>DISSOLVED</u> | <u><10</u> | | | | | |

Black moist solid, Septic

This report has been prepared for the exclusive use and benefit of Chemical Waste Management. No representation concerning sample validity or analytical accuracy or completeness is hereby made to any other person receiving this report.

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-0762

MARCH 11, 1985
APPLICATION RECEIVED: 01/31/85
PERMIT NUMBER: 950170-0316000056
PERMIT ISSUED TO:

WASTE STREAM NUMBER: 950170
PERMIT EXPIRES: 03/05/90

CHEMICAL WASTE MANAGEMENT
P.O. BOX 129
CALUMET CITY, ILL. 60409

CHEMICAL WASTE MANAGEMENT
P.O. BOX 129
CALUMET CITY, ILL. 60409

WASTE NAME: SEWAGE TREATMENT SLUDGE
WASTE CLASSIFICATION: NON-HAZARDOUS NOT SUBJECT TO FEE

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

DISPOSAL SITE: CID PROCESSING

ILPA SITE NO.: 0316000056

DISPOSITION OF WASTE:

WASTE TREATMENT:

ATTENTION: FRANK SMITH

ILPA GENERATOR NO.: 0390350008

WASTE GENERATOR: BURGESS-NORTON MFG CO-PLANT #1

737 PEYTON STREET

GENEVA, IL

60134

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND ANY SPECIAL CONDITIONS LISTED BELOW.

LWE:KAS

CC: BURGESS-NORTON MFG CO-PLANT #1

REGION: N

W. FASTER, P.E.

MANAGER, PERMIT SECTION

DIVISION OF LAND POLLUTION CONTROL

3/14/85

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1984 | 1,995 | 12/04/84 |
| | 2,000 | 11/13/84 |
| | 2,000 | 11/09/84 |
| | 2,000 | 11/07/84 |
| | 2,000 | 10/29/84 |
| | 2,000 | 8/22/84 |
| | 2,000 | 7/25/84 |
| | 2,000 | 7/05/84 |
| 1983 | 2,000 | 10/28/83 |
| | 2,000 | 9/30/83 |
| | 2,000 | 6/28/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE NORTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #2 - FACILITY SITE PLAN - EXHIBIT #2)

MAXIMUM STORAGE CAPACITY: 2,000 GALLONS

DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 3) BULK STORAGE TANK #3 (ABOVE GROUND IN GRINDING ROOM BASEMENT)
 WASTES STORED: WASTE COOLANT & OIL FROM LAPPING (GRINDING) SYSTEM
 WASTE SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1985 | 2,000 | 2/09/85 |
| 1984 | 2,000 | 6/18/84 |
| 1983 | 2,000 | 6/27/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE SOUTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #3 - FACILITY SITE PLAN - EXHIBIT #2)

MAXIMUM STORAGE CAPACITY: 2,000 GALLONS

DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 4) WASTEWATER TREATMENT UNIT (ABOVE GROUND)
 WASTES STORED: WASTE OILS & PRECIPITATED SUSPENDED SOLIDS FROM THE PROCESS WASTEWATER DISCHARGES PRIOR TO WASTEWATER DISCHARGE TO CITY OF GENEVA MUNICIPAL SANITARY SEWER SYSTEM
 WASTE STREAM SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA & IEPA

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1985 | 3,500 | 10/18/85 |
| | 5,000 | 9/19/85 |
| | 5,000 | 8/19/85 |
| | 5,000 | 7/26/85 |
| | 5,000 | 7/01/85 |
| | 4,800 | 6/18/85 |
| | 4,000 | 5/30/85 |
| | 4,500 | 5/10/85 |
| | 4,500 | 4/17/85 |
| | 4,500 | 3/08/85 |
| | 2,500 | 1/24/85 |

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1984 | 2,500 | 12/21/84 |
| | 2,650 | 11/29/84 |
| | 2,400 | 10/26/84 |
| | 2,500 | 9/27/84 |
| | 2,600 | 9/06/84 |
| | 2,650 | 8/15/84 |
| | 2,600 | 7/25/84 |
| | 2,500 | 6/28/84 |
| | 2,800 | 5/24/84 |
| | 2,100 | 4/19/84 |
| | 2,200 | 3/26/84 |
| | 2,500 | 3/06/84 |
| | 3,000 | 2/01/84 |
| 1983 | 2,200 | 12/21/83 |
| | 2,500 | 11/22/83 |
| | 3,000 | 10/17/83 |
| | 2,300 | 9/14/83 |
| | 3,500 | 8/11/83 |
| | 3,500 | 7/06/83 |
| | 3,500 | 5/19/83 |
| | 3,500 | 4/20/83 |
| | 3,500 | 3/15/83 |
| | 3,500 | 2/16/83 |
| | 3,500 | 1/19/83 |

BULK SLUDGE HOLDING TANK COLLECTS WASTE OILS SKIMMED FROM PROCESS WASTEWATER DISCHARGED AS WELL AS PRECIPITATED SUSPENDED SOLIDS FROM PROCESS WASTEWATER DISCHARGES (REFERENCE #4 - FACILITY SITE PLAN - EXHIBIT #2)

MAXIMUM STORAGE CAPACITY: 1,400 GALLONS, WITH 9" FREEBOARD
 DIMENSIONS: 6 FEET WIDE, 6 FEET LONG, 10.5 FEET DEEP

NOTE. . . SLUDGE IS OFTEN SLURRIED WITH WATER TO ALLOW PUMPING.
 THIS ACCOUNTS FOR THE VARIATION IN MAXIMUM STORAGE
 CAPACITY VERSUS ACTUAL VOLUME SHIPPED FOR DISPOSAL.



BURGESS-NORTON MFG. Co.

737 PEYTON STREET • GENEVA, ILLINOIS 60134
(312) 232-4100 TELEX 720-449

CERTIFIED MAIL -
RETURN RECEIPT
REQUESTED.

January 21, 1986

RCRA Activities
Region V
P.O.Box A3587
Chicago, IL 60690
Attn: ATKJG

RECEIVED

JAN 22 1986

SWD - AIS
U.S. EPA, REGION V

AMSTED INDUSTRIES INCORPORATED
BURGESS-NORTON MFG. CO., PLANT 1
U.S EPA I.D. #ILD062406038

Gentlemen:

Enclosed you will find the completed "CERTIFICATION REGARDING
POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS" as re-
quested in Mr. David Stringham's 1/17/86 correspondence.

Should you have any questions concerning same, do not hesitate
to contact me.

Sincerely,

BURGESS-NORTON MFG. CO.

Frank J. Smith

Frank J. Smith
Environmental Engineer

Enclosure - (6) Sheets

CC - JEWilliams SEKelm ASNyman RLMurphy
EJBrosius, AMSTED
File: Environmental Engineering - Plant 1
Facility Closure

COPY 2

ONE OF THE **Amsted**
INDUSTRIES

PISTON PINS • CARBIDE TAPPETS • ROCKER ARMS • VALVE GUIDES • POWDER METAL PARTS • MECHANICAL KEYS • PRECISION MACHINED PRODUCTS

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS
(CLOSURE PLAN REVIEW)

FACILITY NAME: BURGESS-NORTON MFG. CO., PLANT 1

EPA I.D. NUMBER: IEPA I.D. #0890350008 U.S. EPA I.D. #062406038

LOCATION CITY: 737 PEYTON STREET - GENEVA,

STATE: IL 60134

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

| | <u>YES</u> | <u>NO</u> |
|-----------------------------------|------------|-----------|
| • Landfill | _____ | _____ |
| • Surface Impoundment | _____ | _____ |
| • Land Farm | _____ | _____ |
| • Waste Pile | _____ | _____ |
| • Incinerator | _____ | _____ |
| • Storage Tank (Above Ground) | <u>X</u> | _____ |
| • Storage Tank (Underground) | _____ | _____ |
| • Container Storage Area | _____ | _____ |
| • Injection Wells | _____ | _____ |
| • Wastewater Treatment Units | <u>X</u> | _____ |
| • Transfer Stations | _____ | _____ |
| • Waste Recycling Operations | _____ | _____ |
| • Waste Treatment, Detoxification | _____ | _____ |
| • Other _____ | _____ | _____ |

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if available.

REFERENCE EXHIBIT #1 (3 PAGES) - WASTE STORAGE TANKS AND WASTEWATER

TREATMENT UNIT NARRATIVE DESCRIPTIONS, AND EXHIBIT #2 - FACILITY

SITE PLAN.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII Of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Frank J. Smith Environmental Engineer
Typed Name and Title

Frank J. Smith
Signature

1/20/86

Date

EXHIBIT #1

- 1) BULK STORAGE TANK #1 (ABOVE GROUND)
 WASTES STORED: WASTE METALWORKING OILS (LUBRICATING & HYDRAULIC OILS)
 WASTE SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS-UNDER-RCRA

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1985 | 3,000 | 9/26/85 |
| | 1,660 | 5/20/85 |
| | 830 | 3/19/85 |
| | 1,225 | 2/04/85 |
| 1984 | 1,300 | 10/24/84 |
| | 2,900 | 7/18/84 |
| | 1,500 | 5/17/84 |
| | 2,500 | 3/09/84 |
| 1983 | 2,000 | 12/21/83 |
| | 2,000 | 11/23/83 |
| | 2,000 | 10/13/83 |
| | 2,000 | 7/28/83 |
| | 2,000 | 2/01/83 |

STORAGE TANK IS A SQUARE CARBON STEEL BULK STORAGE TANK LOCATED NORTH OF PLANT 1 RECEIVING DEPARTMENT (REFERENCE #1 - FACILITY SITE PLAN - EXHIBIT #2)

MAXIMUM STORAGE CAPACITY: 3,240 GALLONS

DIMENSIONS: 6 FEET HIGH, 6 FEET WIDE, 12 FEET LONG

- 2) BULK STORAGE TANK #2 (ABOVE GROUND - IN GRINDING ROOM BASEMENT)
 WASTES STORED: WASTE METALWORKING COOLANTS (WASTE SOLUBLE OILS, SEMI AND FULL SYNTHETIC COOLANTS)
 WASTE SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1985 | 2,000 | 10/16/85 |
| | 2,000 | 9/03/85 |
| | 2,000 | 7/25/85 |
| | 1,700 | 5/31/85 |
| | 2,000 | 4/19/85 |
| | 2,000 | 3/20/85 |
| | 2,000 | 2/19/85 |
| | 2,000 | 2/09/85 |
| | 2,000 | 1/11/85 |

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1984 | 1,995 | 12/04/84 |
| | 2,000 | 11/13/84 |
| | 2,000 | 11/09/84 |
| | 2,000 | 11/07/84 |
| | 2,000 | 10/29/84 |
| | 2,000 | 8/22/84 |
| | 2,000 | 7/25/84 |
| | 2,000 | 7/05/84 |
| 1983 | 2,000 | 10/28/83 |
| | 2,000 | 9/30/83 |
| | 2,000 | 6/28/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE NORTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #2 - FACILITY SITE PLAN - EXHIBIT #2)
 MAXIMUM STORAGE CAPACITY: 2,000 GALLONS
 DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 3) BULK STORAGE TANK #3 (ABOVE GROUND IN GRINDING ROOM BASEMENT)
 WASTES STORED: WASTE COOLANT & OIL FROM LAPPING (GRINDING) SYSTEM
 WASTE SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED NON-HAZARDOUS UNDER RCRA

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1985 | 2,000 | 2/09/85 |
| 1984 | 2,000 | 6/18/84 |
| 1983 | 2,000 | 6/27/83 |

STORAGE TANK IS A CYLINDRICAL STEEL BULK STORAGE TANK LOCATED ALONG THE SOUTH WALL OF THE GRINDING ROOM BASEMENT (REFERENCE #3 - FACILITY SITE PLAN - EXHIBIT #2)
 MAXIMUM STORAGE CAPACITY: 2,000 GALLONS
 DIMENSIONS: 7 FEET DIAMETER, 7 FEET HIGH

- 4) WASTEWATER TREATMENT UNIT (ABOVE GROUND)
 WASTES STORED: WASTE OILS & PRECIPITATED SUSPENDED SOLIDS FROM THE PROCESS WASTEWATER DISCHARGES PRIOR TO WASTEWATER DISCHARGE TO CITY OF GENEVA MUNICIPAL SANITARY SEWER SYSTEM
 WASTE STREAM SHIPPED OFF-SITE FOR DISPOSAL
 WASTE STREAM CONSIDERED HAZARDOUS UNDER RCRA - EPA HW#FO06 - WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS

| YEAR | VOLUME OF WASTE DISPOSED (GALLONS) | DISPOSAL (SHIPMENT) DATE |
|------|------------------------------------|--------------------------|
| 1985 | 3,500 | 10/18/85 |
| | 5,000 | 9/19/85 |
| | 5,000 | 8/19/85 |
| | 5,000 | 7/26/85 |
| | 5,000 | 7/01/85 |
| | 4,800 | 6/18/85 |
| | 4,000 | 5/30/85 |
| | 4,500 | 5/10/85 |
| | 4,500 | 4/17/85 |
| | 4,500 | 3/08/85 |
| | 2,500 | 1/24/85 |

| <u>YEAR</u> | <u>VOLUME OF WASTE DISPOSED (GALLONS)</u> | <u>DISPOSAL (SHIPMENT) DATE</u> |
|-------------|---|---------------------------------|
| 1984 | 2,500 | 12/21/84 |
| | 2,650 | 11/29/84 |
| | 2,400 | 10/26/84 |
| | 2,500 | 9/27/84 |
| | 2,600 | 9/06/84 |
| | 2,650 | 8/15/84 |
| | 2,600 | 7/25/84 |
| | 2,500 | 6/28/84 |
| | 2,800 | 5/24/84 |
| | 2,100 | 4/19/84 |
| | 2,200 | 3/26/84 |
| | 2,500 | 3/06/84 |
| | 3,000 | 2/01/84 |
| 1983 | 2,200 | 12/21/83 |
| | 2,500 | 11/22/83 |
| | 3,000 | 10/17/83 |
| | 2,300 | 9/14/83 |
| | 3,500 | 8/11/83 |
| | 3,500 | 7/06/83 |
| | 3,500 | 5/19/83 |
| | 3,500 | 4/20/83 |
| | 3,500 | 3/15/83 |
| | 3,500 | 2/16/83 |
| | 3,500 | 1/19/83 |

BULK SLUDGE HOLDING TANK COLLECTS WASTE OILS SKIMMED FROM PROCESS WASTEWATER DISCHARGED AS WELL AS PRECIPITATED SUSPENDED SOLIDS FROM PROCESS WASTEWATER DISCHARGES (REFERENCE #4 - FACILITY SITE PLAN - EXHIBIT #2)

MAXIMUM STORAGE CAPACITY: 1,400 GALLONS, WITH 9" FREEBOARD
 DIMENSIONS: 6 FEET WIDE, 6 FEET LONG, 10.5 FEET DEEP

NOTE. . . SLUDGE IS OFTEN SLURRIED WITH WATER TO ALLOW PUMPING.
 THIS ACCOUNTS FOR THE VARIATION IN MAXIMUM STORAGE
 CAPACITY VERSUS ACTUAL VOLUME SHIPPED FOR DISPOSAL.

BULK STORAGE TANK #4

WASTEWATER TREATMENT
SLUDGE HOLDING TANK

BULK STORAGE TANK #1

WASTE METALWORKING OILS

BULK STORAGE TANK #2

WASTE METALWORKING
COOLANTS

BULK STORAGE TANK #3

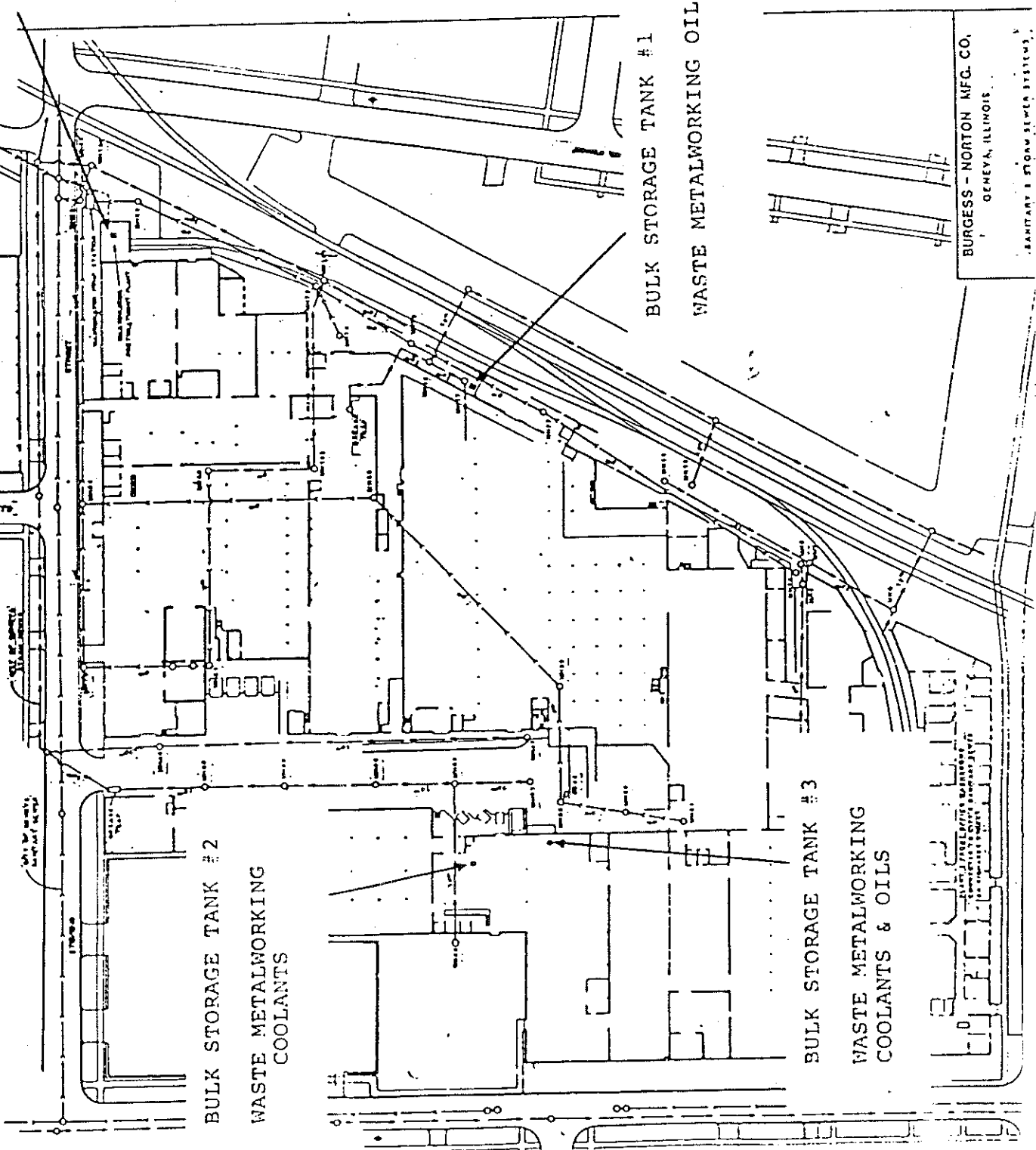
WASTE METALWORKING
COOLANTS & OILS

BURGESS - NORTON MFG. CO.
GENEVA, ILLINOIS

SANITARY & STORM SEWER SYSTEMS



LEGEND
--- SANITARY SEWER
--- STORM SEWER
--- WATER MAIN
--- GAS MAIN
--- RAILROAD
--- HIGHWAY
--- FENCE
--- BUILDING
--- TANK
--- VALVE
--- MANHOLE
--- PUMP
--- ELECTRICAL
--- TELEPHONE
--- CABLE
--- LIGHTING
--- FURNACE
--- BOILER
--- CHILLER
--- CONDENSER
--- HEATER
--- COOLER
--- DRYER
--- PRESS
--- MILL
--- GRINDER
--- CRUSHER
--- SIZER
--- SORTER
--- WASH
--- CLEAN
--- POLISH
--- FINISH
--- PAINT
--- COAT
--- GLAZE
--- VARNISH
--- LACQUER
--- ENAMEL
--- POWDER
--- RESIN
--- EPOXY
--- URETHANE
--- ACRYLIC
--- VINYL
--- POLYESTER
--- POLYURETHANE
--- POLYIMIDE
--- POLYETHER
--- POLYCARBONATE
--- POLYACETAL
--- POLYAMIDE
--- POLYIMIDE
--- POLYETHER
--- POLYCARBONATE
--- POLYACETAL
--- POLYAMIDE



PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**BURGESS-NORTON MANUFACTURING COMPANY,
PLANT 1
GENEVA, ILLINOIS
ILD 062 406 038**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

| | | |
|-----------------------------|---|--|
| Work Assignment No. | : | C05087 |
| EPA Region | : | 5 |
| Site No. | : | ILD 062 406 038 |
| Date Prepared | : | July 6, 1993 |
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| PRC No. | : | 009-C05087-IL4K |
| Prepared by | : | Resource Applications, Inc. (William Earle) |
| Contractor Project Manager | : | Shin Ahn |
| Telephone No. | : | (312) 856-8700 |
| EPA Work Assignment Manager | : | Kevin Pierard |
| Telephone No. | : | (312) 886-4448 |

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- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Burgess-Norton Manufacturing Company, Plant 1 (Burgess-Norton) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Burgess-Norton facility (EPA Identification No. ILD 062 406 038) in Geneva, Illinois. The PA was completed on April 29, 1992. RAI gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. Additional information pertaining to the facility and surrounding area was obtained from publications from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS) and the U.S. Department of the Interior (USDI). The VSI was conducted on April 30, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified five SWMUs and one AOC at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and six inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

RELEASED
DATE 5/5/99
RIN #
INITIALS W/V

ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Burgess-Norton Manufacturing Company, Plant 1 (Burgess-Norton) facility in Geneva, IL. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Burgess-Norton Facility manufactures piston pins. The manufacture of piston pins generates zinc phosphate sludge, waste caustic quench sludge, and waste oil. The associated quality control laboratory generates spent Freon and spent methanol. The facility has operated at its current location since 1903. The facility occupies 7.3 acres in a residential area and employs about 225 people. The facility is operating as a small-quantity generator. In the past, Burgess-Norton had two RCRA container storage areas, both of which were RCRA closed in 1988. The Part A permit application listed two tank storage units; this was done in error and referred to two process units, which generate, but do not manage waste. The facility's Part A permit application was withdrawn in 1988.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Former Outdoor Storage Area
2. Former Indoor Storage Area
3. Zinc Phosphating Fume Scrubber
4. Wastewater Treatment System
5. Laboratory Waste Satellite Accumulation Area

Area of Concern

1. Former Underground Storage Tank Areas

The potential for release to ground water from all SWMUs is low because they are either closed or located inside. The AOC has a documented release and therefore the potential for ground water contamination must be considered high. Remediation is planned for the AOC.

The potential for unpermitted release to surface water for the SWMUs and AOC is low. The Wastewater Treatment System, SWMU 4, discharges to the City of Geneva sanitary sewer under a City of Geneva General Wastewater Discharge Permit. The Wastewater Treatment System (SWMU 4) has the capability of holding up to two days' discharge if necessary.

The facility reports that it maintains a facility wide air emissions permit. The potential for unpermitted release is low for all SWMUs except SWMU 5, as most of the wastes generated are liquids with low volatility, sludges, or solids. SWMU 5 has a solvent odor around it, and therefore has a moderate potential for release to outside air.

The potential for release to on-site soils is low for all SWMUs. A release to the soil has occurred from AOC 1. The facility is aware of this and is planning to remediate.

RAI recommends that the AOC be remediated per IEPA guidelines and that SWMU 5 be better managed to minimize the potential for air releases. Once the AOC has been remediated, no further action will be necessary for this facility.

RELEASED
DATE 5/5/99
RIN #
INITIALS

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors.

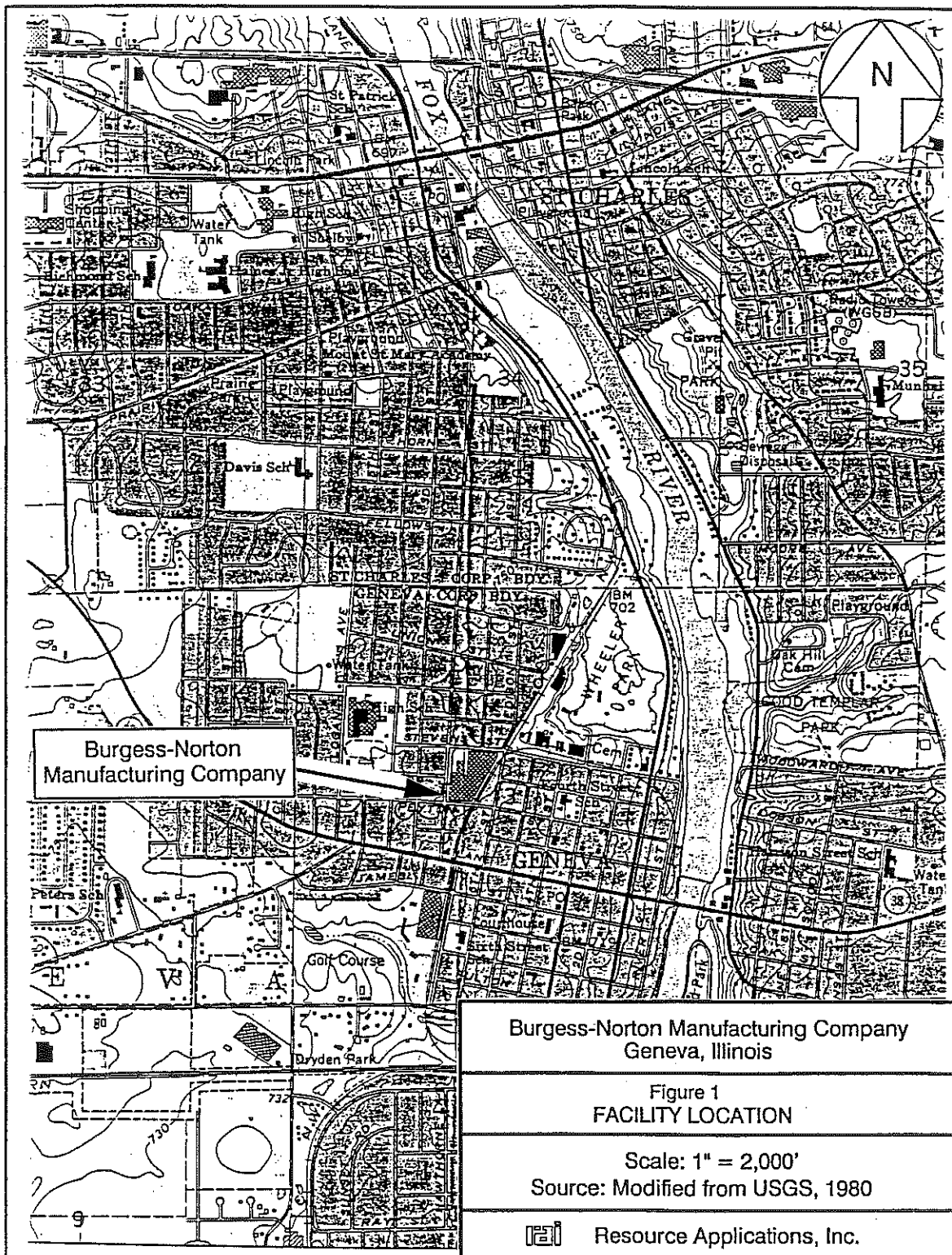
2.1 FACILITY LOCATION

The Burgess-Norton facility is located at 737 Peyton Street in Geneva, Kane County, Illinois (latitude 41°54'52' N and longitude 88°14'48' W). Figure 1 shows the location of the facility in relation to the surrounding topographic features. The facility occupies 7.3 acres in a residential area.

The Burgess-Norton facility is bordered on the north by an employee parking lot and residences; on the west by Richards Street and residences; on the south by Peyton Street, Burgess-Norton general offices, parking lot, and residences; and on the east by an abandoned railroad right-of-way, parking lot, and residences.

2.2 FACILITY OPERATIONS

The Burgess-Norton facility manufactures piston pins. The piston pins are made from steel bars or coil steel. The manufacturing process is primarily mechanical. The steel is cut, machined, ground, and drilled as necessary. Zinc phosphate is used as a carrier for sodium stearate lubricant for these processes in a closed loop system. Some of the piston pins are then phosphate-coated, using an acid bath zinc phosphating procedure. The piston pins are then heat treated and quenched in either oil or caustic quench as required. Final machining is then done, followed by packaging and shipment. Steel coil and bars are stored north of the facility in a warehouse until needed. The finished product is typically stored at the facility prior to shipment. The facility generates used lead-acid batteries from its lift vehicles for recycling. Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.



The facility has operated at its current location since 1903 and employs about 225 people in three shifts, with most employees working the first shift. The facility is located on approximately 7.3 acres and has approximately 200,000 square feet of floor space in one main building. Two additional buildings, located on the north side of Stevens Street, are used to store incoming steel. The area is currently a residential area, however the facility predates most of the residences.

The phosphate and sludge quench tanks are part of the manufacturing processes and are emptied as necessary. The zinc phosphate and caustic quench sludge are emptied into the wastewater treatment system; the waste quench oil and sludge is pumped directly from process to tank trucks for transportation to a reclaiming facility. In the past, the zinc phosphate sludge and caustic quench sludge were managed in 55- or 85-gallon drums and stored in the Former Outdoor Storage Area (SWMU 1) prior to disposal off site. Zinc phosphate fumes from the zinc phosphating process are run through the Zinc Phosphating Fume Scrubber (SWMU 3) prior to discharge. Wastewater from the Zinc Phosphating Fume Scrubber (SWMU 3), along with other industrial wastewater, is treated by the Wastewater Treatment System (SWMU 4), prior to discharge. The scrap steel is recycled off site. The Laboratory Waste Satellite Accumulation Area (SWMU 5) accumulates spent methanol and spent Freon from the quality control laboratory. In the past, these wastes, along with spent 1,1,1-trichloroethane used in degreasing, were stored at the Former Indoor Storage Area (SWMU 2) prior to disposal off site.

The facility had 14 Underground Storage Tanks (USTs) (AOC 1) at one time. These USTs were used to store fuel oil and gasoline for use at the facility. One of the fuel oil USTs was reported to have leaked. The size of the release is unknown. For more information see Section 2.4.

The facility has been owned and operated by Burgess-Norton Manufacturing Company since operations began. Burgess-Norton has been a division of Amsted Industries since 1965.

2.3 WASTE GENERATION AND MANAGEMENT

The special and hazardous waste streams presently generated at the Burgess-Norton facility are waste quench oil and sludge, caustic quench sludge, zinc phosphate sludge, wastewater, spent Freon, spent methanol, waste oil, and mixed waste from various sources. In the past, the facility has

generated spent 1,1,1-trichloroethane from a degreasing process no longer used. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOC is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Piston pin production consists of machining steel, and phosphating and/or heat treating depending on the metallurgical requirements. Presently, the process generates no hazardous waste. Waste quench oil and sludge from the oil quench tanks is pumped from process tanks to trucks to be recycled off-site by Beaver Oil & Sludge of Hodgkins, Illinois. Approximately 250 gallons of waste quench oil and sludge are removed from the process tanks every 2 to 3 years.

The zinc phosphate sludge, Zinc Phosphating Fume Scrubber (SWMU 3) wastewater and caustic quench sludge are pumped from process equipment through pipes and treated with the facility's process wastewater in the Wastewater Treatment System (SWMU 4). Annually, approximately 275 cubic yards of a mixed waste (all nonhazardous) are generated primarily from housekeeping procedures, furnace soot, and waste soap and sludge from water washing operations. This waste is managed on site in a dumpster before being transported by Fox Valley Disposal as a special waste to Settlers Hill Landfill and Recycling in Batavia, Illinois or Woodland Landfill and Recycling in South Elgin, Illinois for disposal. After accumulation in the Laboratory Waste Satellite Accumulation Area (SWMU 5), spent Freon and spent methanol from the quality control laboratory are picked up by a licensed waste handler for off-site disposal at a licensed facility. In the past, these wastes have been transported and disposed of by Baron Blakeslee of Cicero, Illinois.

The Wastewater Treatment System (SWMU 4) generates several waste streams. Waste oil and waste coolant generated from the oil/water separator are accumulated and dewatered in a waste oil tank, which is part of SWMU 4, prior to being transported and disposed of off-site by Beaver Oil Co. These wastes are disposed of as a special waste and are generated at an annual quantity of approximately 85,000 gallons. The Wastewater Treatment System (SWMU 4) also generates sludge, which is accumulated in the clarifier and emptied into a dumpster, which is part of SWMU 4, for transportation and disposal. Approximately 210 cubic yards of this waste are generated annually. This waste is transported by Fox Valley Disposal to Settlers Hill Landfill and Recycling in Batavia, Illinois, or Chemical Waste Management/CID No. 2, in Calumet City, Illinois, for disposal. The

TABLE 1
SOLID WASTE MANAGEMENT UNITS

| <u>SWMU Number</u> | <u>SWMU Name</u> | <u>RCRA Hazardous Waste Management Unit^a</u> | <u>Status</u> |
|------------------------|--|---|------------------|
| 1 | Former Outdoor Storage Area | Yes | Closed, Inactive |
| 2 | Former Indoor Storage Area | Yes | Closed, Inactive |
| 3 | Zinc Phosphating Furne Scrubber | No | Active |
| 4 | Wastewater Treatment System | No | Active |
| 5 | Laboratory Waste Satellite Accumulation Area | No | Active |

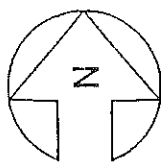
Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

Richards Street

Peyton Street

Stevens Street



Solid Waste Management Units (SWMU)

1. Former Outdoor Storage Area
2. Former Indoor Storage Area
3. Zinc Phosphating Fume Scrubber
4. Wastewater Treatment System
5. Laboratory Waste Satellite Accumulation Area

Area of Concern (AOC)

1. Former Underground Storage Tank Areas

SWMU 1

SWMU 2

SWMU 3

SWMU 4

SWMU 5

AOC 1

Burgess-Norton Manufacturing Company
Geneva, Illinois

Figure 2
FACILITY LAYOUT/SWMU AND AOC LOCATIONS

Scale: 1" = 77'
Source: Modified from Burgess-Norton, 1992

Resource Applications, Inc.

TABLE 2
SOLID WASTES

| <u>Waste/EPA Waste Code^a</u> | <u>Source</u> | <u>Solid Waste Management Unit</u> |
|---|--|------------------------------------|
| Waste Quench Oil and Sludge/NA | Quench Oil Tanks | Removed from process |
| Industrial Wastewater/NA | Zinc Phosphating Fume Scrubber, Process Equipment | 4 |
| Caustic Quench Sludge/NA ^b | Caustic Quench Tanks | 1 and 4 |
| Zinc Phosphate Sludge/NA ^c | Zinc Phosphating Tanks | 1 and 4 |
| Mixed Waste/NA | Furnace Soot, Wastes from Housekeeping Procedures, Waste Soap, and Sludge from Water Washers | Removed from process |
| Spent 1,1,1-Trichloroethane/(F001) ^d | Former Metal Degreasing Process | 2 |
| Spent Methanol/(F003) | Quality Control Laboratory | 2 and 5 |
| Spent Freon/(F002) | Quality Control Laboratory | 2 and 5 |
| Wastewater Treatment Sludge/NA | Wastewater Treatment System | 4 |

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b This waste was previously managed as a hazardous waste with a D000 code (due to zinc) because IEPA considered it a hazardous waste but not an EPA hazardous waste. Subsequently, the waste was managed under a D002 code (due to corrosivity).

^c This waste was previously managed as a hazardous waste with a D002 code.

^d This waste is no longer generated.

TABLE 2 (CONT'D)

SOLID WASTES

| <u>Waste/EPA Waste Code^a</u> | <u>Source</u> | <u>Solid Waste Management Unit</u> |
|---|-----------------------------|------------------------------------|
| Waste Oil/NA | Wastewater Treatment System | 4 |
| Waste Coolant/NA | Wastewater Treatment System | 4 |
| Zinc Phosphate Fumes | Zinc Phosphating Process | 3 |
| Used Lead-Acid Batteries | Battery Powered Equipment | Removed from process |

Notes:

- ^a Not applicable (NA) designates nonhazardous waste.
- ^b This waste was previously managed as a hazardous waste with a D000 code (due to zinc) because IEPA considered it a hazardous waste but not an EPA hazardous waste. Subsequently, the waste was managed under a D002 code (due to corrosivity).
- ^c This waste was previously managed as a hazardous waste with a D002 code.
- ^d This waste is no longer generated.

effluent from the Wastewater Treatment System (SWMU 4) is discharged into the City of Geneva sanitary sewer under a City of Geneva General Wastewater Discharge Permit.

Fumes generated from the zinc phosphating process are managed by the Zinc Phosphate Fume Scrubber (SWMU 3). SWMU 3 does not generate any particulates. The water used to remove the fumes is sent to the Wastewater Treatment System (SWMU 4) for treatment.

Some of the forklifts used at the facility are battery powered. When spent, these lead-acid batteries are exchanged with the Exide Battery Company of Countryside, Illinois for new batteries as needed.

In the past, the caustic quench sludge and the zinc phosphate sludge were removed from the process and stored in 55- or 85-gallon drums in SWMU 1 prior to being disposed of off site, usually at Chemical Waste Management's Model City, New York landfill, as hazardous waste (D000 and D002). The zinc phosphate sludge was managed as a D000 waste because IEPA considered zinc to be hazardous, though EPA did not. After April 25, 1982, this waste was managed as a D002 waste. These wastes were hazardous only because of corrosivity, and are currently treated by the Wastewater Treatment System (SWMU 4). Larger quantities of spent 1,1,1-trichloroethane were formerly generated by degreasing processes no longer used and stored in SWMU 2 prior to disposal off site.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Burgess-Norton facility.

The only documented, unpermitted release is from one of the 14 Former Underground Storage Tank Areas (AOC 1). This release was of an unknown quantity of fuel oil into the ground. The facility notified the Illinois Emergency Services Disaster Agency (IESDA) of the release on September 20, 1989, and obtained Incident No. 891840 (IESDA, 1989). The facility has hired Groundwater Technology, Inc. as a consultant. The facility and their consultant have investigated the problem, conducted soil sampling and installed monitoring wells. This information is unavailable in IEPA or EPA files, and, pursuant to the facility's legal counsel, the facility representatives would not

discuss this issue further. The facility is presently discussing a remediation strategy with its consultants. The location of one of the leaking USTs is shown in Figure 2.

There is no history of documented, unpermitted releases from any of the SMWUs.

2.5 REGULATORY HISTORY

Burgess-Norton submitted a Notification of Hazardous Waste Activity form to EPA on August 10, 1980 (Burgess-Norton, 1980a). The facility submitted a RCRA Part A permit application on November 18, 1980 (Burgess-Norton, 1980b). This application listed the following waste process codes and capacities: two S01 codes (20,000 and 2,500 gallon capacities) (SWMUs 1 and 2) and two S02 codes (incorrectly identified process tanks of 500 gallons each) for these. The application listed the following wastes: F001, F010, F012, D000, and D002. On April 21, 1981, Burgess-Norton filed an amended Part A permit application removing the F010 and F012 waste streams, stating that cyanide salts were not used in its quenching medium (Burgess-Norton, 1981). On April 25, 1982, the Part A permit application was revised removing the D000 waste stream and adding a D002 waste. (Burgess-Norton, 1982b). On June 3, 1988, IEPA notified the facility that it had withdrawn the Part A permit application in conjunction with approval of the facility's closure certification (Burgess-Norton, 1988). Copies of the closure plan were not found in IEPA or EPA files reviewed during the PA. This action made the facility subject to generator-only regulations and formally closed the Former Outdoor Storage Area (SWMU 1) and the Former Indoor Storage Area (SWMU 2). Additional documentation of the closure of SWMUs 1 and 2 was not found in the files reviewed during the PA.

Some minor paperwork violations, e.g. failure to have a closure plan, failure to have submitted a contingency plan to appropriate local agencies, and failure to have "Danger" signs posted were noted during an IEPA inspection on February 8, 1982 (IEPA, 1982). The facility responded on February 15, 1982 that the violations had been corrected (Burgess-Norton, 1982a). No further documentation was found indicating IEPA's approval.

On May 21, 1984, Burgess-Norton was the subject of a Complaint and Compliance Order for failing to provide financial responsibility information (EPA, 1984a). This Order was withdrawn on

September 6, 1984 after it was determined that IEPA had misfiled the required information (EPA, 1984b).

The facility maintains two NPDES outfalls for storm water and non-contact cooling water discharge. The effluent from SWMU 4 is discharged into the City of Geneva sanitary sewer under a City of Geneva General Wastewater Discharge Permit. The effluent from SWMU 4 was determined noncompliant in August 1986, shortly after the facility had modified the wastewater treatment process (Burgess-Norton, 1988). No further information concerning this incident was available. No other violations were found.

The facility reports that they maintain a facility-wide air permit. The facility has not had a history of air permit compliance problems and has not had odor complaints from area residents.

The facility had 14 USTs. The facility reports that all are inactive and have either been closed-in-place according to Illinois State Fire Marshall guidelines or removed. One of the USTs in the Former UST Areas (AOC 1) was found to have released fuel oil into the ground. IEPA will oversee the remediation.

There has been no CERCLA activity at this facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the Burgess-Norton facility.

2.6.1 Climate

The climate in Kane County is temperate and continental. The average daily temperature is 47.5°F. The lowest average daily temperature is 16°F in January. The highest average daily temperature is 83°F in July.

The total annual precipitation for the county is 35.62 inches (Ruffner, 1985). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1963).

The prevailing wind is from the west. Average wind speed is highest in March at 12 miles per hour from the north-northwest. The average wind speed is 10.3 miles per hour in a westerly direction (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Burgess-Norton facility reports that they are not located in the 100 or 500 year flood plain. According to the Flood Insurance Rate Map for Geneva, Illinois, the facility is located outside the 500-year flood plain boundary (FEMA, 1981).

Surface water from the site flows into storm sewers and is discharged under NPDES Permit No. IL0036331.

The nearest surface water body, the Fox River, is located 0.5 mile east of the facility and is used for recreational and water supply purposes.

2.6.3 Geology and Soils

No site specific geologic information was available in IEPA or EPA files, and pursuant to the advice of legal counsel, the facility representatives would not discuss the information obtained as part of the UST release investigation, so regional information is presented here. The soils underlying the facility consist of the Markham silt-loam group with 2 to 5 percent slopes (USDA, 1979). These soils are gently sloping and moderately well-drained. Typically, the surface layer of this soil group is a very dark grayish-brown and dark yellowish brown silty clay loam, underlain by a subsoil about 24 inches thick. The upper part of this subsoil typically consists of dark brown and dark yellowish brown silty clay loam, and the lower part consists of a yellowish brown and light yellowish brown silty clay loam. The underlying soils, to a depth of 60 inches, typically consists of a light yellowish-brown, calcareous silty clay loam till.

Beneath the surface soils lie soils belonging to the St. Charles Moraine unit of the Yorkville Member of the Wedron formation (Willman and Lineback, 1970). These soils typically consist of mostly gray to dark gray clayey tills and locally silty clayey till. These soils contain abundant small pebbles, local lenses of silts, and, less commonly, lenses of sand and gravel. These deposits are from the Woodfordian substage of the Wisconsin stage of glaciation. These soils are estimated to be about 100 feet thick in the vicinity of the facility (Willman, 1971).

The uppermost bedrock beneath the facility is part of the Ordovician Maquoketa Group, consisting mainly of grey and green shale, with some oolitic limestones and dolomites in the upper half. Beneath the Maquoketa rocks are dolomites of the Galena-Platteville Group, sandstones of the Ancestral (Glenwood-St. Peter) Group, and sandstones and dolomites of the Prairie du Chien group. Beneath the Ordovician rocks are sandstones, siltstones, and dolomites of Cambrian age, underlain by Precambrian granite basement at depth. The exact thickness of the above-mentioned units are not known; however, the combined thickness of the Silurian rocks, and the Ordovician Maquoketa and Galena-Platteville groups is approximately 500 feet (Willman, 1971).

2.6.4 Ground Water

An out-of-service well of unknown depth exists at the facility. In the past, this well was used to supply water for industrial and emergency purposes at the facility. Several monitoring wells are also located at the facility. These were installed as part of the facility's determination of the extent of release from the USTs.

No site-specific ground water information was available in IEPA or EPA files, and pursuant to the advice of legal counsel, the facility representatives would not discuss the information obtained as part of the UST release investigation, so regional information is presented here. The glacial tills in the vicinity of Burgess-Norton may contain some sand and gravel lenses, which are good sources of ground water. Domestic ground water supplies are readily available from sand and gravel. Dolomite lies directly beneath the glacial drift, and yields ground water at most locations through open crevices and channels. The deeper Galesville sandstone (of Cambrian age) is encountered at a depth of between 1,000 and 2,000 feet, and is used for industrial and municipal ground water supplies. In

addition, the Ordovician-St. Peter sandstone is a local source of large water supplies, and is approximately 500 feet thick in the vicinity of Geneva (Bergstrom, et al., 1955).

The location of the nearest off-site ground water well is not known. The City of Geneva obtains its drinking water from deep and shallow groundwater wells. Ground water in the area generally flows south. The depth of shallow ground water on the site is not known, and pursuant to advice of legal counsel, the facility representatives would not discuss this subject further.

2.7 RECEPTORS

The Burgess-Norton facility occupies 7.3 acres in a residential area in Geneva, Illinois. Geneva has a population of about 12,000 people.

The Burgess-Norton facility is bordered on the north by an employee parking lot and residences; on the west by Richards Street and residences; on the south by Peyton Street, Burgess-Norton general offices, parking lot, and residences; and on the east by an abandoned railroad right-of-way, parking lot, and residences. The nearest school, the Fourth Street School, is located 1,000 feet east of the facility.

Facility access is controlled by fences, gates, and building doors. The facility has a 24-hour guard.

The nearest wetland, and surface water body, the Fox River, is located 0.5 miles east of the facility. The Fox River is used for recreational and water supply purposes for the City of Aurora (approximately 7 miles downstream). The City of Geneva does not use the Fox River as a water supply source.

An out-of-service well exists at the facility. In the past, this well was used to supply water for industrial and emergency purposes at the facility. Ground water is also used for municipal and industrial water supply purposes in the county.

Sensitive environments are not located on site. The nearest wetland environment is the Fox River, located 0.5 mile east of the facility (USDI, 1984).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Outdoor Storage Area

Unit Description: The Former Outdoor Storage Area is located in the alley that divides part of the site. The unit measures 75 feet by 12 feet and is on asphalt, reported to be 0.75 inch thick (see Photograph No. 1). The unit had no barricades to keep vehicles from entering.

Date of Startup: This unit began operation around 1980.

Date of Closure: This unit ceased operation in 1985 and RCRA closure was approved by IEPA in 1988 (IEPA, 1988).

Wastes Managed: This unit managed the zinc phosphate sludge (D000, then changed to D002) and caustic quench sludge (D002) wastes in 55- and 85-gallon drums.

Release Controls: The unit had no secondary containment or release controls.

History of Documented Releases: No releases from this unit have been documented.

Observations: No evidence of release was noted. This unit was empty at the time of the VSI. The asphalt was in good condition, with no visible cracks. No drains are located near the unit, however a paved swale borders the unit on the west side, which drains north to a storm sewer.

SWMU 2**Former Indoor Storage Area**

Unit Description: The Former Indoor Storage Area is in the room north of the heat treating processes and measures approximately 7.5 feet by 12 feet (see Photograph No. 2). The unit was located on a concrete floor 8 to 12 inches thick. No floor drains are present in the vicinity of this unit.

Date of Startup: This unit began operation in 1980.

Date of Closure: This unit ceased operation in 1985 and RCRA closure was approved by IEPA in 1988 (IEPA, 1988).

Wastes Managed: This unit managed spent 1,1,1-trichloroethane (F001), spent methanol (F003), and spent Freon (F002).

Release Controls: Aside from the concrete floor, this unit had no release controls or secondary containment.

History of Documented Releases: No releases from this unit have been documented.

Observations: This area is presently used to store maintenance equipment and has some minor oil spillage. The concrete floor was in good condition.

SWMU 3**Zinc Phosphating Fume Scrubber**

Unit Description: The Zinc Phosphating Fume Scrubber consists of a hood above the zinc phosphating process tanks which collects fumes and directs the fumes through an adjacent scrubbing unit (see Photograph No. 3). This unit is located on the south wall of the zinc phosphating room. The remaining vapor is then released to the air. The wastewater from this unit is treated in the Wastewater Treatment System (SWMU 4).

Date of Startup: This unit began operation about 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit controls the fumes from the phosphating process.

Release Controls: This unit discharges under a facility-wide air permit.

History of Documented Releases: No unpermitted releases from this unit have been documented.

Observations: No evidence of unpermitted release was noted. The unit is relatively new and appears to be in good condition.

SWMU 4

Wastewater Treatment System

Unit Description: The Wastewater Treatment System is located indoors at the northeast corner of the facility. The unit is located in two adjacent rooms. The unit has a pretreatment system for oily wastes which separates oil from water, and accumulates the oil in a separate tank. Water from the pretreatment system joins process wastewater and is further treated. This treatment consists of adding lime to raise the pH to 9.2 in order to form metal hydroxides. The above processes are performed in the south room. In the north room of this unit, a polymer is added as a flocculent. The wastewater is mixed and then run through a clarifier to settle out the metal hydroxides (see Photograph No. 4). The clarifier sludge is removed from process for off site disposal. Following clarification, the pH of the wastewater is lowered by the addition of sulfuric acid so that it is below 9. The wastewater is then chlorinated in a process that uses sodium hypochlorite tablets prior to discharge to the City of Geneva Sanitary

sewer under a City of Geneva General Wastewater Discharge Permit.

Date of Startup: This unit began operation in 1973.

Date of Closure: This unit is active.

Wastes Managed: This unit manages all the process wastewater and aqueous wastes. Waste oil is collected by this unit and is periodically hauled off-site for recycling. The sludges generated by this unit are managed at this unit in the clarifier until they are moved to a dumpster prior to being disposed of off site as a special waste.

Release Controls: The building and process tanks serve as release controls. The unit is monitored and has the capacity to hold approximately two days worth of wastewater if necessary. The equalization tank holds approximately 10,000 gallons.

History of Documented Releases: No unpermitted releases from this unit have been documented.

Observations: The unit appeared to be operating properly at the time of the VSI.

SWMU 5 Laboratory Waste Satellite Accumulation Area

Unit Description: The Laboratory Waste Satellite Accumulation Area contains two drums (one for spent methanol, one for spent freon) located indoors approximately 100 feet west of the quality control laboratory. Several other drums containing waste oil were also located in this area (see Photograph No. 5).

Date of Startup: This unit began operation about 1988.

Date of Closure: This unit is active.

Wastes Managed: This unit manages spent methanol (F003) and spent Freon (F002) from the quality control laboratory in 55-gallon drums. Several drums labelled waste oil were also present in this area.

Release Controls: The building serves as secondary containment as all the floor drains have been plugged.

History of Documented Releases: No releases from this unit have been documented.

Observations: No visual evidence of release was noted at this unit. However, a solvent odor was noted in this area. The spent methanol and spent Freon have reportedly been under accumulation at this unit for more than 90 days. The facility maintains that they are in compliance with their generator-only status. The facility states that the spent Freon and spent Methanol drums are both less than half full.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; the location of one of the USTs that leaked is shown in Figure 2.

AOC 1 Former Underground Storage Tank Areas

The facility reports that they had 14 underground storage tanks (USTs) on this site, which were used to store gasoline and/or fuel oil. These tanks were located all over the site. These tanks were decommissioned by removal, or closed in place where removal was not practical and was allowed by the Illinois State Fire Marshall. One of the USTs was identified as having leaked. The size of the release is not known. The facility notified IESDA on September 20, 1989, of the leaking tank and obtained IESDA Incident No. 891840 (IESDA, 1989). The facility and their consultants, Groundwater Technology, Inc., are discussing remedial strategies. IEPA will review the information provided by the facility and its consultants prior to approving the completion of remediation.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Burgess-Norton facility.

Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1 Former Outdoor Storage Area

Conclusions: This unit was a paved area outdoors used to store drums containing caustic quench sludge and zinc phosphate sludge. The facility reports that this unit did not have any secondary containment. This unit has a nonexistent potential for release to ground water, surface water, air, or on-site soils as it has undergone RCRA closure, had its closure certification approved by IEPA, and was subsequently never used (IEPA, 1988). Previously, the unit had moderate potential for release to the environment as it was located outdoors with no secondary containment.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 2 Former Indoor Storage Area

Conclusions: This unit was located inside the facility and used to store solvents from a degreasing process no longer used. Presently, this area is used to store some maintenance and housekeeping supplies. This unit has low potential for release to ground water, surface water, air or on-site soils as it has undergone RCRA closure, had its closure certification approved by IEPA, and is inactive

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(IEPA, 1988). Previously, this unit had low potential for release to the environment due to its indoor location.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 3 Zinc Phosphating Fume Scrubber

Conclusions: This unit is located indoors in the zinc phosphating room and controls fumes from the zinc phosphating process. This unit has low potential for unpermitted release to ground water, surface water or on-site soils as it is located inside and manages air pollutants. This unit has low potential for unpermitted release to air because the fumes are removed.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 4 Wastewater Treatment System

Conclusions: This unit is located indoors at the northeast corner of the facility. This unit treats process wastewaters, zinc phosphating wastes, zinc phosphating scrubber water, and caustic quench wastes. This unit has low potential for release to ground water, air or on-site soils as it is located indoors. The unit has low potential for unpermitted release to surface waters as the effluent discharge to the City of Geneva sanitary sewer is monitored pursuant to a City of Geneva General Wastewater Discharge Permit.

Recommendations: RAI recommends no further action for this SWMU at this time.

SWMU 5 Laboratory Waste Satellite Accumulation Area

Conclusions: This unit consists of an indoor area on a concrete floor with two 55-gallon drums, each reportedly less than half full, to accumulate hazardous wastes (spent methanol and spent Freon) and several other drums of waste oil. This

unit is located inside the facility approximately 100 feet from the laboratory. This unit has low potential for release to ground water, surface water and on-site soils as it located indoors. This unit has moderate potential for release to air as noted by odors in the vicinity of this unit.

Recommendations: RAI recommends that the facility find a better way to manage the wastes in this unit to minimize the potential for air releases.

AOC 1 Former Underground Storage Tank Areas

Conclusions: The facility has notified IESDA of a release. The facility and its consultants are discussing remediation strategies.

Ground water: There is a high potential for contamination of ground water, due to the contaminated soils from one of the underground storage tanks.

Surface water: There is a low potential for release to surface water from this unit because the contamination is in the soils.

Air: There is a low potential for release to air from the area because the contamination is in the soils.

On-site soils: There has been a documented release from one of the USTs to on-site soils. There is low potential for release to surface water and air from this area as the contamination is located in the soils.

Recommendations: IEPA has set generic cleanup objectives for releases from UST systems. A facility has the option to request site specific cleanup objectives. Therefore, RAI recommends that remediation be performed until IEPA guidelines are met.

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TABLE 3
SWMU AND AOC SUMMARY

| <u>SWMU</u> | <u>Dates of Operation</u> | <u>Evidence of Release</u> | <u>Recommended Further Action</u> |
|---|---------------------------|-------------------------------------|--|
| 1. Former Outdoor Storage Area | 1980 to 1988 | None | No further action. |
| 2. Former Indoor Storage Area | 1980 to 1988 | None | No further action. |
| 3. Zinc Phosphating Fume Scrubber | 1988 to present | No evidence of unpermitted release | No further action. |
| 4. Wastewater Treatment System | 1973 to present | No documented unpermitted release | No further action. |
| 5. Laboratory Waste Satellite Accumulation Area | 1988 to present | Noticeable odor during VSI | Minimize the potential for air releases. |
| <u>AOC</u> | <u>Dates of Operation</u> | <u>Evidence of Release</u> | <u>Recommended Further Action</u> |
| 1. Former UST Areas | Unknown | Documented release to on-site soils | Remediate per IEPA guidelines |

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

| | |
|----------------|-----------------------------------|
| 01 STATE IL | 02 SITE NUMBER ILD 062 406 038 |
|----------------|-----------------------------------|

II. SITE NAME AND LOCATION

| | | | | | |
|---|----------------|--|-------------------|----------------|--------------|
| 01 SITE NAME (Legal, common, or descriptive name of site) Burgess-Norton Manufacturing Company, Plant 1 | | 02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 737 Payton Street | | | |
| 03 CITY Geneva | 04 STATE IL | 05 ZIP CODE 60134 | 06 COUNTY Kane | 07 COUNTY CODE | 08 CONG DIST |
| 09 COORDINATES: LATITUDE 41 54 52.N | | LONGITUDE 088 14 48.W | | | |
| 10 DIRECTIONS TO SITE (Starting from nearest public road) Illinois Route 38 to Geneva, Illinois. Turn north on Richards Street, go to Payton Street. Facility is on the northeast corner of Richards and Payton. | | | | | |

III. RESPONSIBLE PARTIES

| | | | | | |
|---|----------------|--|---------------------------------------|--|--|
| 01 OWNER (if known) Amsted Industries | | 02 STREET (Business, mailing, residential) 205 North Michigan Avenue 44th floor | | | |
| 03 CITY Chicago | 04 STATE IL | 05 ZIP CODE 60601 | 06 TELEPHONE NUMBER (312) 645-1700 | | |
| 07 OPERATOR (If known and different from owner) Same as owner | | 08 STREET (Business, mailing, residential) | | | |
| 09 CITY | 10 STATE | 11 ZIP CODE | 12 TELEPHONE NUMBER | | |
| 13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN | | | | | |
| 14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 08 / 10 / 80 MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ MONTH DAY YEAR <input type="checkbox"/> C. NONE | | | | | |

IV. CHARACTERIZATION OF POTENTIAL HAZARD

| | | | | | |
|--|--|--|--|--|--|
| 01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 04 / 30 / 92 <input type="checkbox"/> NO | | BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): Resource Applications, Inc. | | | |
| 02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN | | 03 YEARS OF OPERATION 1903 Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN | | | |

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Quenching oil, aqueous sodium hydroxide, sodium hypochlorite, zinc phosphate, 1,1,1-trichloroethane, trichlorotrifluoromethane, sulfuric acid, methylene chloride, methanol, stearate soap, lead-acid batteries.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
There is known soil contamination from AOC 1. The area has been impacted due to a release of fuel oil from one of the underground storage tanks. The facility is aware of the situation and is discussing remediation strategies with their consultant. A voluntary remediation is planned.

V. PRIORITY ASSESSMENT

| | | | |
|---|--|--|--|
| 01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form) | | | |
|---|--|--|--|

VI. INFORMATION AVAILABLE FROM

| | | | | | |
|--|--|---|--|---------------------------------------|---|
| 01 CONTACT Kevin Pierard | | 02 OF (Agency/Organization) EPA Region 5 | | 03 TELEPHONE NUMBER (312) 886-4448 | |
| 04 PERSON RESPONSIBLE FOR ASSESSMENT William T. Earle | | 05 AGENCY | 06 ORGANIZATION Resource Applications, Inc. | 07 TELEPHONE NUMBER (312) 332-2230 | 08 DATE 06 / 11 / 92 MONTH DAY YEAR |

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Burgess-Norton Manufacturing Co. Plant 1
737 Peyton St.
Geneva Illinois
ILD 062 406 038

Date: April 30, 1992

Primary Facility Representative: Mr. Frank J. Smith, Manager of Environmental Engineering
Representative Telephone No.: (708) 232 3297
Additional Facility Representatives: Mr. Guy E. West, Chief Metallurgist/Laboratory Manager
Mr. Daniel S. Corrigan, Personnel/Safety Supervisor
Mr. Scott Burich
Mr. John Medgysei

Inspection Team: William Earle, Resource Applications, Inc. (RAI)
Jeff Indeck, RAI

Photographer: William Earle

Weather Conditions: Sunny, temperature about 80°F, calm

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at approximately 2:00 p.m. The tour included all areas of the production facility and all SWMUs and the AOC. Pictures of each SWMU and the AOC were taken.

The tour concluded at 4:20 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:30 p.m.



Photograph No. 1

Orientation: South

Description: Former Outdoor Storage Area. This area was used to store zinc phosphating and caustic quench wastes.

Location: SWMU 1

Date: 4/30/92



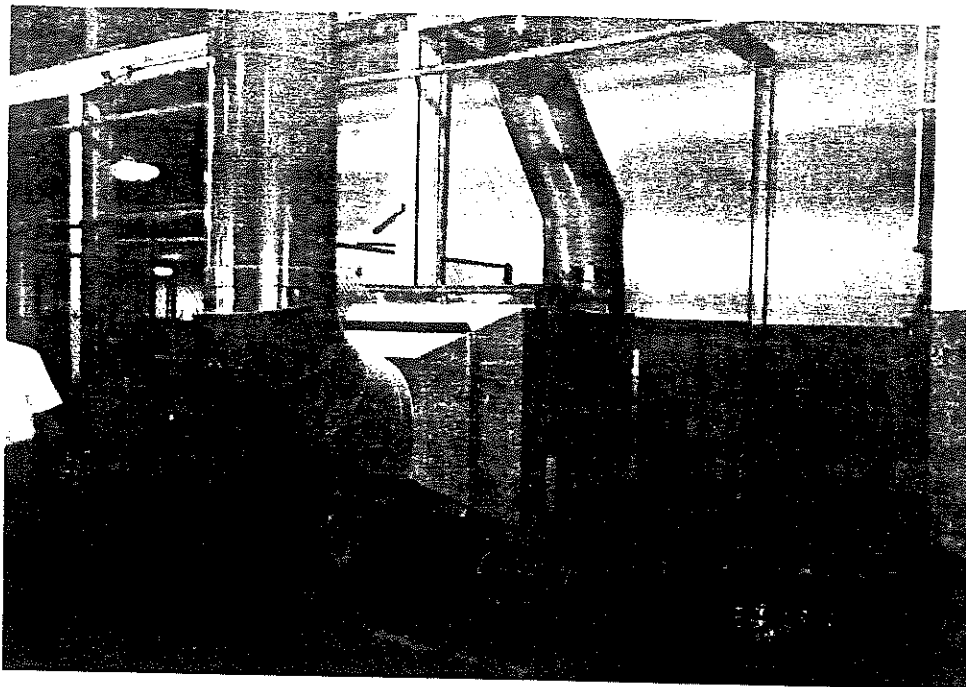
Photograph No. 2

Orientation: Southeast

Description: Former Indoor Storage Area. This area is currently used to store some housekeeping and maintenance supplies.

Location: SWMU 2

Date: 4/30/92



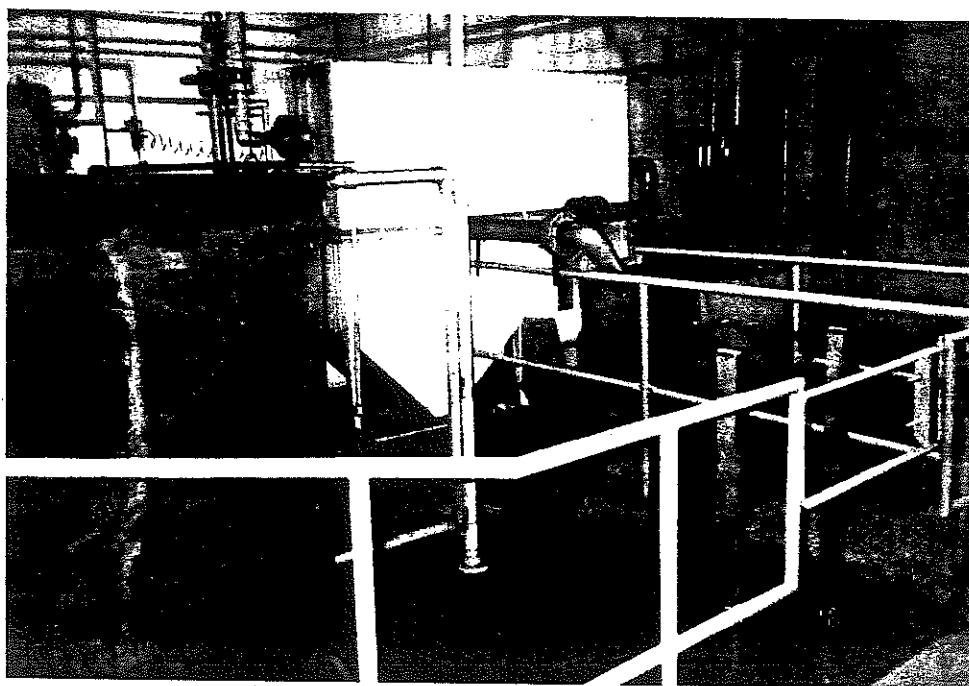
Photograph No. 3

Orientation: Southeast

Location: SWMU 3

Date: 4/30/92

Description: Zinc Phosphate Fume Scrubber. This unit controls odors from the zinc phosphating operation with a water spray.



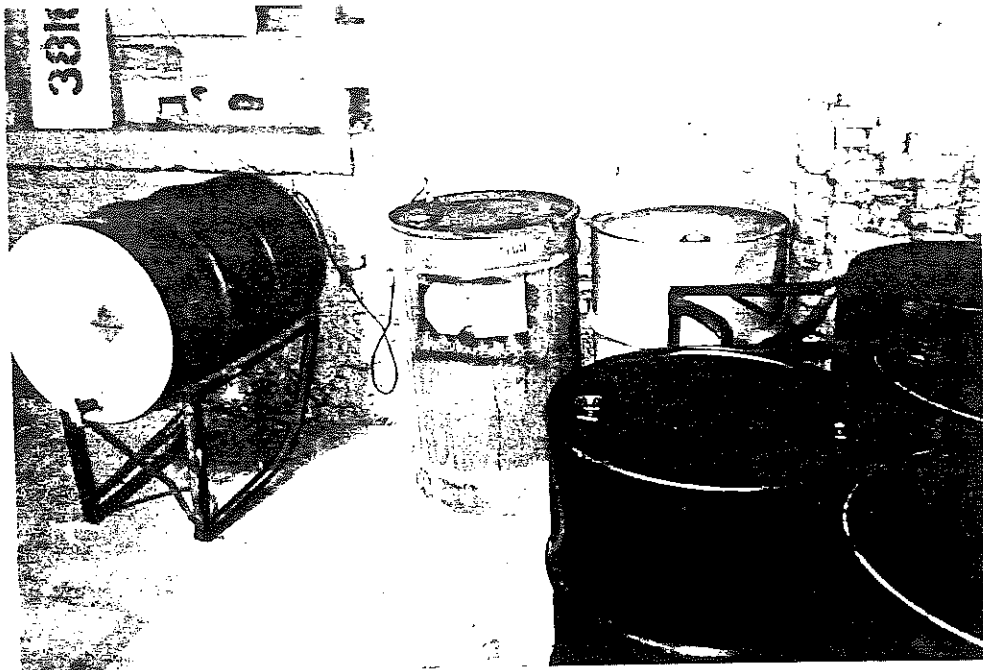
Photograph No. 4

Orientation: Northeast

Location: SWMU 4

Date: 4/30/92

Description: Wastewater Treatment System, south room. This room contains the oil/water separator, precipitant tank, and waste oil tank.



Photograph No. 5

Orientation: West

Description: Laboratory Waste Satellite Accumulation Area. One of the drums contains spent methanol, the other spent Freon TF.

Location: SWMU 5

Date: 4/30/92



Photograph No. 6

Orientation: Northwest

Description: One of Several Former Underground Storage Tank Area. Note monitoring well in center of picture with concrete collar.

Location: AOC 1

Date: 4/30/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

FRANK SMITH

41

SCOTT BURICH.

JOHN MEDGESI

BURGESS-NORTH MFG. CO.

BEGAN OPERATIONS IN 1903

BEGAN HERE. BEGAN IN PART OF FACILITY
METAL FABRICATION.

HAZARDOUS WASTE STORAGE OPS IN 1976.

UNKNOWN DISPOSITION PRIOR.

FABRICATED PRIOR TO BN.

200,000 SQ FT FLOOR SPACE.

* LAND SIZE +/- 5/6 ACRES.

BN IS DIVISION OF AMSTER.

PURCHASED BN IN 64 OR 65.

UNK FAL TITLE. MAYBE AMSTER.

BECAUSE WHOLLY OWNED BY AMSTER.

CT CORP SYSTEM.

AGENT AUTH TO RECEIVE CORRES
ON BEHALF OF AMSTER

APPLIES TO ALL AMSTER DISPOSITION.

AGENT NOT PART OF CORP. CHAIN.

RESIDENCES ON ALL 4 SIDES

GENERAL OFFICES TO S.

PARALLEL LOT TO N BUT HOUSE ON BLOCK

E TO RR ROW E LOT BEFORE HOUSE

W ACROSS STREET.

FACILITY PREDATES HOUSES.

MUNICIPAL GENEVA

SANITARY MUNICIPAL.

STORM-SYSTEM DRAIN & SEWER.

OUTFALL TO FOX RIVER.

1 DEEP WELL. OLD INDUSTRIAL USE (FIRE)

NO LONGER USED.

STORM TO FOX RIVER

NOT TREATED PRIOR TO DISCHARGE

FOX RIVER IS CLOSEST SURFACE WATER.

CITY PARK WHEELER 0.5 MILES NE.

RECREATION.

HIGH SCHOOL 1/4 NW

4TH ST SCHOOL ELEM 3 BULS.

HOSPITAL SW 2 MILES.

FACILITY IS SECURE. FENCED & GATED

SECURITY 2 & 3 SHIFT PLUS WEEKENDS.

FACILITY OPERATES 3 SHIFTS. GUARD DURING 2 & 3

225 PEOPLE, MOST IN 1ST SHIFT

60 IN GEN OFFICES

2ND FACIL IN GENEVA, DEKALA, MUSKOGEE MT

CLAMORE OULA

FACILITY GENERATES PISTON PINS.

MADE FROM BAR OR COIL STEEL

MOST OF PRODUCTION PROCESS IS MECHANICAL.
METAL IS HEAT TREATED.

CUT, MACHINE, GRIND, COLD FORM.

METAL COMES TO LINE COATING

BAR & RUST PREVENT. PETROLEUM BASED.
NOT CLEANED.

COLD METAL PROCESS STARTS TO GLUE HEADS.

METAL IS FORMED, DRILLED, CUT, GROUND ETC.

HEAT TREAT FOLLOWS FORMING BUT PRIOR TO
FINAL FINISH GRINDING.

Zn PHOSPHATING IS PRIOR TO COLD FORMING
HELPS FOR STEAMATE LUBRICANT

PETROLEUM FINISH AS RUST PREVENTATIVE.

Zn PINS DONE AS ACID BATH.

COATING LINE OPERATORS MONITOR BATCHES.

Zn PROCESS LIQUID DECANT TO HOLD TANK

Zn + Fe PROS. MANUAL REMOVE FROM TANK

TO 55 OR 85-GAL DRUMS.

MANAGED IN
OUTSIDE STORAGE

TYPICALLY STEEL, TYPICALLY LINED.

ABOUT 90% ON TIME OF CLOSURE, BELIAN

PH ADJUST & NADH TO A PH. NOW DISPOSED
OFF SITE BUT NOT AS HAZ WASTE.

ADJUSTED IN BATCH TANKS.

44

WATER FROM ST PETERSBURG.

SOME WELLS TO PELOTONICA OR GALES TO MIX

FACILITY. MAY WW TREATMENT SYSTEM

PRECIPITATE METAL HYDROXIDES

MANAGED AS NON HAZ CAKE

Zn PHOS MANAGED IN SOLID FORM. DRUMMED.

CHEM WASTE HAUL & TSD.

MODEL CITY, N.Y.

SWITCHED IN 86

CAUSTIC QUENCH WAS SODIUM HYDROX

FOLLOWED HEAT TREAT. PROCESS IN TANKS

MANAGED IN 55 OR 85 g

MOVED BY PUMPS OR SHOVELS.

PROBABLY USED SAP.

DRUMS MOVED TO STORAGE AREA

WHEN FULL

FULL DRUMS TAKEN TO OUTSIDE STORAGE AREA

HAZARD. DUE TO HIGH PH.

LANDFILLED AT MODEL CITY.

Zn & NiOH MAY HAVE GONE TO WM IN ^{ALL} EUREKA

WASTE IS GEN BUT NOT DISPOSED OFF-SITE

TREATED IN WWT SYSTEM.

NO CYANIDES USED IN PROCESSES.

F 010 QUENCH BATH FROM HEAT TREAT.

F 012 QUENCH SLUDGE FROM HEAT TREAT

NOW SHIPPED TO CYANIDE

NOT ANSWERED BY EPA, BUT EPA WAS NOTIFIED.

CHANGE WAS MADE IN TIEPA FOLLOWING
CLOSURE.

ALSO HAD A SIMILAR PROCESS TO OIL.

MANAGE SEPARATE FROM CAUSTIC SLUDGE.

COLLECTED TO OIL FROM BATH.

SHIPPED OFF SITE FOR RECYCLE FROM RECYCLER

REFINERY PRODUCTS CO. MILLER PARK.

HANDLED IN BULK. PORT 500 g TANKS.

TANKS WERE EMPTIED BY TANK TRUCK.

BULK TANKS STORED IN MOUNT WHEN EMPTY

AT PROCESS DURING FILLING. UNK WHEN FULL
TO TANK TRUCK FOR EMPTYING.

~~THE~~ PROCESS DECISION BASED ON

METAL REQUIREMENTS OF QUENCHING.

TCA USED AS A DEGREASER.

COLD PARTS CLEANING IN DIP TANK.

NO STILL.

SLUDGE REMOVED. LIQUID REMOVED.

BOTH MANAGED TOGETHER.

MANAGED IN 55-g. DRUMS.

Probably
stored in
dept.

DRUMS MANAGED IN INSIDE STORE AREA.

4AT STORE AREAS ASSOC TO TCA.

ESTIMATES OF VOL% TCA 20 AM, Q=20 Zn 100 DRUM

SOLVENT WENT TO OFF SITE RECYCLER -

SAFETY KLEEN / GEN SOLV - BARON BLAKESLEY

LARAMIE AV IN CINCINNATI

4-K ELGIN FACILITY.

FREON WASTE TMC TRICHO TRIFLUOR + METH CHLOR

+/- 50%.

USED AS A LAB REAGENT, CLEANER &

FILTER MEDIA.

MOST CONSUMED IN PROCESS. REST TO 55-9

ACCOM DRUM. DRUM NEAR HW STORE AREA

+/- 30' AWAY

1 DRUM / YEAR MANAGED LIKE TCA.

METHANOL - USED IN LAB TO ETCH STEEL SAMPLES

WASTE METHANOL AND ALD

SENT TO RECLAIM / RECYCLER

PH NEUTRAL PRIOR TO DISPOSAL

VERY SMALL AM.

+/- 100 ml DAY. < 1 DR / YEAR.

MUCH CONSUMED IN PROCESS.

45 Wast, 85 CIL, CP 10/84, Pot Rel,

47

WASTE STREAMS SINCE 80. UNKNOWN

LAST Zn, CAUSTIC AS HW IN 88

FREON NOT GEN. ^{SINCE} NOW. LONG TERM PROCESS + EVAP.

TCA NOT FOR 2 YRS

LOW VOL FREON & METH.

METH IN 55-g DRUM.

2 DRUMS IN 4AA METH AND FREON.

OUTSIDE AREA ASPHALT. 12' x 75' x 0.75"

NO 2ND CONTAIN OR RELEASE CONTROL

NO DRAINS.

START +/- 1980. STOPPED IN 85

JAN 88. CONT. TO IEPA. ACKN IEPA 6/88

CLEAN CLOSURE & NO REMEDIATION.

LONG CORRESP PROCESS FOR CLOSURE.

MANAGED Zn + QUENCH CAUSTIC.

NO RELEASES, NO ACCID, SPILLS.

INSIDE AREA CONCRETE 7.5' x 12' x 12"

NO 2ND OR REL CON

SOLU. TO AREA TCA.

SEP FROM SAT ACC AREA

BEGIN 1980, CEASED ABOUT 85, CLOSED 88

NO SPILLS, RELEASES, ETC.

4AA IN SEP AREA

SAA IS SEP AREA OUTSIDE LAB

PRIOR TO CLOSING '84

1 DRUM METH, 1 DRUM FREON

ON CEMENT. NO DRAINS. NO SPILLS.

FACILITY OPERATES AS CE SQC

DOESN'T KNOW HOW STATE REGS FACIL.

NO INSPECT SINCE CLOSURE.

NO NEW STOR. AREAS

NO SO₂ STORAGE

NO OTHER STORAGE

NPOES TWO OUTFALLS. OUTFALLS TO FOX RIVER

BOTH ONLY SELF MONITORING.

T, PH, BOD, TSS, FOGG.

IEPA NO ENFORCEMENT ACTIONS.

FACILITY WIFE PERMIT

NO SO₂ STORE

WASTES ACCUM & STORED IN SAME AREA.

DRUM STORAGE OUTSIDE < 75

DRUM STORAGE INSIDE < 75

LARGE STORAGE ARE

TANKS ARE PROCESS TANKS TO PROCESS CHEM.

WWT

PROCESS CHEMS MANAGED IN UNIQUE AREA
CHEMS IN 55-G DRUMS

GRINDING COOLANT SYSTEM. SOL OIL SYS 15K g
TSP 7K gAL. SWITCH IN +/- 84
TRISODIUM PHOSPHATE

OVERSPRAY & DIC DRY & ABSORBANTS
SPECIAL WASTE
BULK. ROLLOFF DUMPSTER

INDUSTRIAL
CONTAINED A WASTE MANAGED IN ROLLOFF
USE SPECIAL WASTE PERMIT
GIVEN REFUSE AS DEBRIS.

Coolant is PETROL BASED. EMULSION.
METAL sent off Hauled as METAL SCRAP.

CLOSED LOOP SYSTEM, METAL ON MEMBRANE

MAINTENANCE FLUIDS MANAGED IN BULK STORE
LIKE Q.O.I.

FORK LIFT & MAINT. Some propane, some
LEAD ACID. waste

Now all aqueous fluids to WWT 2 wastes

WWT 1 Oil

~ Metal hydroxide Sludge

Line testing - BY Line OPERATOR.

~~LAB~~ - Line fluids NOT MANAGED AS SEP WASTE.
CENTRAL TREATMENT.

WWT 5 mol. 26. 73.

TREATED INDUSTRIAL WASTEWATER.

PH, GETTING.

PH ACID & CAUSTIC

GETTING - CHEMS LIME COAG

ANION POLYMER AS FLOC

CONTINUOUS TREATMENT

EQUILIZATION BASIN CONCRETE & EPOXY

10K SIZE. 1/2 IN GROUND AS PART OF

FOUNDATION.

ALSO HAD CLARIFIER.

55 g DRUMS FOR WWT.

FINAL DISCHARGE TO SANITARY.

POSSIBLE TO ADJUST PRIOR TO DISCHARGE.

SOLIDS TO SLUDGE STORE TANK

REMOVED & HAULED AS SPEC WASTE

REFINERY PRODUCTS. NOT ONLY SOLIDS.

ALSO GRAV SEP FOR OILS.

OILS & ^{HYDROX} SLUDGE TO SEP CLARIFIER.

NOW 3 STREAMS OIL, metal HYDROX, FILTER PAPER.

GROSS OILS, THEN FINE SOLIDS, THEN EMULSION &.

NO TANK INTEGRITY TESTING. TANKS IN ENCLOSED BASE
CHAIN TO WWT

LAS OVERPACK CHEM WASTE. PERIODIC HOUSE CLEANING.

2 COMPLAINTS. NOISE ON SCRUBBER.
SPEAKER IN FACILITY.

GRINDING / SCRUBBER.

BURGESS - NORTON

B-N

{ FRANK J SMITH DANIEL CORIGAN
SCOTT BORICH John Medgyesi
GUY WEST

Burgess Norton Mfg. Co. is a division of Amsted Industries

B-N began operations in 1903, the site.

Operations began in one part of current facility.

Metal fabrication

1976 - commencement of heavy waste flows (likely)

use of what was done before

Farmland prior to B-N

~200,000 SF floor space ± 5/6 acres

Division of AMSTED since 64 or 65 - wholly owned
operates as a division

Title Holder unknown - probably AMSTED

CT Corp. Systems is an agent of AMSTED authorizes series
correspondence on behalf of AMSTED or any of its divisions
Not part of corporate chain

Residential development facility: facility preceded residences
except South (General Offices) and North (Phy. lot then houses)
and East (RR ROW, Phy. lot then houses) West - houses are right
across street.

Facility uses Municipal (Geneva) Water supply, municipal sanitary/stormwater
sewer system - outflow to Fox River

~~At~~ B-N has own deep water well - formerly used to generate water
for fire protection - Presently not used.

Storm not treated prior to discharge

B-N

No other known wells

Fox River is closest surface water.
Parks are nearby - Wheeler Pk ~ $\frac{1}{2}$ mile NE
 ↳ Recreation Park

Schools: ~1 mile NW is High School
 4th Street School 3 blocks East

Hospital - SW of facility ~2 miles

No outdoor operations

facility is secured, 24 hr. security; fenced/gated/bldg. perimeter
 225 employees - most are production → most are first shift
 64 across street in Genl Ofc.

1 - ^(GEEVEA) across town 1 - Muskogee, AL
1 - DeKalb 1 - Claremore Oklahoma

This facility - principal product is Paton Pins
 made from bar or coil steel
 most of process is mechanical

Heat treat metal, cut/machine/grind/cold form metal

metal comes into facility coated w/ rust preventative/oil - usually Petroleum Based
Typically - received metal is NOT cleaned before starting to work it

Metal is cut/machined/dried/etc. as necessary to ~~make~~ achieve final shape

Heat treating is typically done after most of work done - but prior to final grinding/surfacing

Zinc Phosphate is used as carrier for sodium stearate (soap) lubricant
 finished products are rust proofed

Zinc Phosphate done as an acid bath

Zinc Phosphate solution typ. monitored by coating operators

General Waste: Et. Petrobr. Form. has wells (18 grain hardness)

Zinc Phosphate tanks: liquid decanted to temporary tank
Zinc/Iron Phosphate sludge removed manually from the
bottom/sides into 55 or 85 gal drums typ. steel, typ. lined
for handling as hazardous (characteristic)

Currently (since 88) started neutralization of Z Phosphate solution
to render non-hazardous (used baking soda). - then disposed
off site as non-hazardous waste.

Neutralization process creates solid powdery/solid - residual
water/acid waste goes to centralized wastewater treat. system
along w/ all other process wastewaters

In part - Zn/Fe Phosphate waste was in solid form

CHEM WASTE MGMT. → ^{MODEL CITY} ~~to~~ NY, switched about 88

QUENCHING: used following heat treating

Caustic Quench was Sodium Hydroxide - Manually removed by Pumps/Elavels
Process was done in tanks - waste into 55/85 gal drums

There probably were satellite accumulation areas at/new process
generating waste to be also partially full drums

Quench drums were stored outside - hazardous because of high pH
Material was landfilled CWM - Model City NY

Some of ZP waste/Centr. may have gone to CWM facility in ENDRIN

Currently waste is still generated but goes to WWT Sys (Since 88)

WWT5 was sub. in late 87/early 88

No cyanide ever used in processes.

Only FOIO :- Quench Oil/sludge from Heat Treat.

FO12 - Quenching W.W. Sludges from Heat Treat. Sludges

Later - EPA changed/clarified definition of FO10/FO12 - & notified Region V.

Zinc Phosphate Drums were moved to outside storage area

Also had Quench Oil → similar process to Caustic Quench
also generated a sludge which was managed separately.

Typ. collected w/ oil from Quench bath, shipped off-site for
recycling - REFINERY PRODUCTS CO. (Schiller Park)

Port Tanks stored waxes/waxes while in use; at ^{least once} when empty
unsure of where managed prior to pumpout

Metallurgical Requirements obtained from Quenching differentials
which Quench Process was used

handled in
bulk
(500 gal portable
tanks
B-N owned.
Tank trucks pumped
from Port Tanks

TCA (Methyl Chloroform - used as a degreaser.

Typ. Cold immersion (dip tank) parts cleaning, No still
Sludge removed from dip tank

TCA waste was sludge + liquid, managed together
Managed in 55 gal / only.

Drums kept at inside storage area. Satellite areas were
associated with TCA

20 drums TCA, 20 drums Quench, 100 drums Zn PO₄

TCA sent to offsite reclaiming facility SAFETY CLEAN OR (Elgin or DALTON)

Baron Blakesley / Genesol (on LARAMIE in Canada)

Baron Blakesley did not make facilities tanks.

FREON - (Freon TMC Trichloro / Tri-fluoro / methyl chloride 50/50 mix)
used in lab as cleaning / filtering media, Most ~~accumulated~~ ^{used}

in process - some was stored in accumulation drum (in site of former

Haz-Waste Accum. Area. ~1 drum/year → handled like TCA to some facility.

METHANOL (Methanol + Acrid) was used in lab - acid neutralized

w/ lime - then recycled / reclaimed - recycler takes care of sludge

used to Etch Elec. Samples (100-200 ml / day, < 1 drum / yr. Most consumed in process

No other hazardous streams.

All handled since 80 → earlier may have been managed in like manner
88 was last time the ZnPO₄ and Caustic Sludge generated for off-site
disposed.

Freon lost to variety of causes (pneum/evaporation) (filter paper)

TCA no longer purchased/generated for last 2 yrs.

Currently, Freon & Methanol managed separately → only wastes
currently generated — 2 drums in satellite accumulation area.

STORAGE AREAS

1- Outside (asphalt) 12' x 75', asphalt: $\frac{1}{2}$ - $\frac{3}{4}$ " thick

was not humped / no secondary containment / release ctrl or drains

~1980 (started), use ceased Oct 85, closure Cert. JAN 88

IEPA Cert. Accept + Withdrawal of Part A in JUNE 88

Testing was done - nothing found - no remediation

Feb. 86 - Amended Closure Cert. Managed Zinc Phosphate & Caustic Quench

Oil was reclaimed directly to truck some trucks / if in tanks usually
found reclaimed next day.

NO Spills / fires / releases / etc.

1- Indoor: concrete area $8' \times 12'$ ^{thick} $7\frac{1}{2}$ ft x 12 ft: no secondary
containment / release controls

Managed: TCA, separate from satellite area for Methanol / Freon

Used ~1980 → 85, closed at same time as Outside

No Releases

Satellite Area: 1 drum of each (Each in 55 gal. drums)

use: 84 → present: just outside of areas - on concrete - no drains in area

Operate as Conditionally Exempt Small Quantity Generator

Unsure as to how state regulates

Floor drains all sealed → have sprinkler system

No new storage area ~~planned~~ or constructed

Never had on SO₂ storage (two 500 gal tanks)

~~can~~ probably were quench tanks associated w/ heat treating process

No other areas where wastes were managed

Still maintain NPDES Permit

in the past - there were 2 Outfalls

in past - outfalls went to Fox River

Permit requires testing - ~~self~~ ^{testing done in-house by control lab} ~~other monitoring~~

No outfall monitoring is done (i.e. by other agencies)

In past: TSS, BOD, pH, Temp, Fat/Oil/Grease

No enforcement (in past) taken w/ respect to NPDES permit

Monthly DMRs sent to IEPA

Have maintained Facility wide Permits for Air

Never was SO₂ storage

2 SO₁ storage areas

Prior to 1980, (H₂) waste was handled / disposed of in a similar manner
Inland / Outside drum storage area in use in 1975

No all-encompassing storage area constructed

Tanks discussed dealt ONLY with process chemicals - they did not manage waste,

Chemicals coming in were managed separately, came in in 55 gal drums
Waste central grinding water system

TSP - 7000 GAL
Soluble Oil - 12000 GAL } closed loop system

Overspray collected w/ OIL-DRY or other absorbents - collected in bulk
presently handled as Special Waste - Prioras Gen'l

All special wastes combined/composted together
General refuse managed separately

Soluble Oil is petroleum based emulsion

solids from soluble oil closed loop system filter build off as reusable scrap.

TSP not used since 1988 - only soluble Oil presently used

Machinery Maintenance, like grease oil, collected in portable ~~press~~ ^{bulk} tank,
pumped out / reclaimed,

Forklift batteries - (lead acid) - Traded with oxide for new batteries

Currently - all aqueous streams are directed to wastewater
treatment plant for treatment; WWT generates metal-hydroxide
sludge and oil waste streams

Zinc phosphate operators did testing on solutions - ~~managed~~ not managed
separately -

1976 → wastewater treatment system installed

PSES (Pre-treatment facility treatment steps) - specifically those related to metal handling
treated for pH, settling of solids (hydroxide)

chemicals (lime) used as co-precipitant + cationic polymer as flocculant
continuous system

Equalization (pH) tank 1000000 GAL Red chain / flight clarifier
↳ 1/2 above / 1/2 below ground level

Water treatment chemicals managed in 55 gal drums
final discharge to sanctuary

TOUR

ONLY WATER

WWTP

free oil removed first - to W.O. tank in COALESCOR
then to Filter Paper
then to oily-WW Equalization tank

OF system separates oil/water by separating water
process tank → refilled from underfloor holding tank
looped until no more ~~oil~~ water can be removed
oil is sent to waste oil tank

citric acid
used to keep
system
when solids
have built up.

Coating line WW ships oily WW tank

bring pH to 9.2 to precipitate metal-hydroxide
lime added to main tank (below floor)

pumped up to flocculator & mixed (polymer added)
clarified water created three baffles
lined steel tanks

after the clarifier - is chlorinated

the sulfuric acid added to bring pH below 8.9

Sodium Hypochlorite tablets used as chlorine source.

10-20 KGPD TYP

Procto 73 → 1/2 MGD

3 Procto
WWTP

P. 1000 Drums storage oil tank

Empty AST area on East side of bldg

Just S. - issued - Empty drums waiting to be returned
to Shipper.

73 WWTS had a 2 day discharge capacity - ~~so that~~ possible hold if not up to spec
Solids held in sludge tank - periodically hauled off site

managed as special waste - 1 facility used was REFINERY PRODUCTS
clarifier design ~~actually~~ acted as oil separator
all clarifier wastes handled together

WWTP 73-88 1 waste stream - combined waste oil/metal hydroxide

88-Present waste oil
separated metal hydroxide sludge

filter paper from index filtering system

currently: Free oil removed - clarifier -

Compactor used for general refuse

Laboratory periodically does 'house cleaning' and generates a lab port

DOO2 (Zn PO₄) placed in ~~outside~~ lined drum and then overpacked
into another container.

2 complaints: 1 noise - damped
2 - Noise / speakers outside

had 14 VSTs - closed by removal / or in place
by BFI

3 DP& or LVST / Petroleum - FVEI or
Groundwater Technologies or handling
will Remediate

VOLUNTARY REMEDIATION

OUTSIDE TAP

Storm Drainers from site thru oil trap to WDES
1 chute near gate.

3 Pictures of Outside Storage Area (Electric lines overhead)
no demarcation off - no barricades started in 1975
for closure, surface was cleared
asphalt/soil drilled/sampled - background sample taken

2 Pictures - indoor storage area, some oil staining/oil dry in us
Drip pans are evident and used in factory
Was washed/leached ^{samples} here as part of closure

~~Plating~~ Area (Zinc Phosphating)

Air with tyfume scrubbers then outside
Plating area drains into WWT5 (WATP)

Fume scrubber is water based - uses waterfall

No particulates generated

Drums marked on drum containment area (Sulfuric Acid)

Acid used to pickle steel prior to phosphating

If spill is likely - would be acid - have soda & lime available

Heat treat / Quench - some rollers - acceptable for process
Quench tank has cover at Falcon

HWSA / Lab area (16 PPM on PID)

Alkaline QA/QC bath Alcohol H₂O₂
Alcohol
Water

Part of grinding line / metal plates on floor cover
return line to lubricant system

Drum pan under two drum storage area / lub oil
W side, near end of 'U' behind porous filter, dumped
from grinding dept. (34D dumpster)
when filled moved down alley.

Drum returns to system other oil
Compactor used for General Refuse only. Every 3 months
Hc. paper used.

LUST area w/ Dno MW

Xs on Block diagram are things that are absent
in part